



**SIRIM QAS INTERNATIONAL SDN. BHD.**  
Building 4, SIRIM Complex, No. 1, Persiaran Dato'  
Menteri, Section 2, 40700 Shah Alam, Selangor,  
Malaysia.

File Ref. : EL04190001

**RSPO PUBLIC SUMMARY REPORT**

**CLIENT : LAM SOON PLANTATIONS SDN BHD CERTIFICATION UNIT**

**PARENT COMPANY : LAM SOON CANNERY PRIVATE LIMITED**

**RSPO MEMBERSHIP No.: 2-0909-18-000-00**

**LOCATION OF THE CERTIFICATION UNIT (MILL AND THE SUPPLY BASE):**

**(In the case of multisite certification, list additional sites in attachments) :**

Certification Unit	Mill and Supply Base	GPS Location		Location
		Latitude	Longitude	
LAM SOON POM CU	Lam Soon Palm Oil Mill	5.254373 N	118.174882 E	28 km off Lahad Datu - Sandakan Highway, 91109 Lahad Datu, Sabah, Malaysia.
	Lam Soon Estate	5.244980 N	118.167033 E	

**MAP :** See Attachment 1

**AUDIT DATE :** 3-7/7/2023

**DURATION :** 15 auditor days

**TYPE OF AUDIT :**



**Annual Surveillance Audit No.**  
01



**Recertification Audit**

**STANDARD :** MYNI 2019 FOR RSPO PRINCIPLE & CRITERIA 2018

**SCOPE OF CERTIFICATION:** Production of Sustainable Crude Palm Oil and Palm Kernel Using Identity Preserved Supply Chain Model

**VALIDITY OF RSPO CERTIFICATE :** 25/8/2022 to 24/8/2027 (RSPO-PC 00125)

**The following attachments form part of this report:**

Non-conformity Report(s)



List of additional site(s)



**Report by Audit Team Leader**

**Acknowledgement by Client's Representative**

Name : **ROHAZIMI MAT NAWI**

Name : **ABDUL HAMID BIN KIMAR**

Signature :

Signature :

Date :

**11/10/2023**

Date :

**13/10/2023**

## RSPO PUBLIC SUMMARY

### SUMMARY OF AUDITS

Recertification Audit 2022				
On-site audit date :	23-27/05/2022		No. of auditor days :	15 auditor days
Remote audit date :				
Audit team :	Rozaimie bin Ab Rahman (LA), Mohd Ab Raouf bin Asis, Ismail Adnan			
No. of major NCR :	1	Indicator: 6.2.2		Closing date: 5/08/2022
No. of minor NCR :	2	Indicator : 4.2.2, 6.7.2		
Indicate by ticking the stakeholders interviewed during the on-site audit	Employees / Workers organizations	Settlers	Villagers / Local communities	Suppliers
	√			√
	Contract workers	Local & National NGOs	Govt. agency / Statutory bodies	Independent growers / Smallholders
	√			
	Indigenous people NA	Contractors	Others (Please specify)	
Supply base sampled :	Lam Soon Estate			
Changes since the last audit :	Planted area changed to 5,593.00 Ha. Refer Table 1 – Summary.			
Justification of audit planning :	Total allocation of auditor days for Lam Soon CU were: Mill = 6 days (5 days for safety and health, environment, mill best practices, GHG verification and Social at Mill) + (1 day for supply chain certification systems) Estate = 6 days for verification of safety and health, environment, good agriculture best practices, Social, HCV, TBP, Partial Certification and GHG verification plus the verification of Land History and Land Title. Combined with MSPO audit = 3 auditor days (extra).			
Name of peer reviewer :	Harso Yuli Antena			
Report approved by :	Kamini Sooriamoorthy		Approval date : 19/09/2022	

Annual Surveillance Audit 1				
On-site audit date :	3-7/7/2023		No. of auditor days :	15 Auditor days
Remote audit date :				
Audit team :	Rohazimi Mat Nawi (TLA), Mohd Zulfakar Kamaruzaman, Nor Ezani Ahmad			
No. of major NCR :	1	Indicator : 6.2.3		Closing date: 6/10/2023
No. of minor NCR :	1	Indicator : 3.3.2		
Indicate by ticking the stakeholders interviewed during the on-site audit	Employees / Workers organizations	Settlers	Villagers / Local communities	Suppliers
	√			√
	Contract workers	Local & National NGOs	Govt. agency / Statutory bodies	Independent growers / Smallholders
	√			
	Indigenous people NA	Contractor	Others (Please specify)	
Supply base sampled :	Lam Soon Estate			
Changes since the last audit :	No change			
Justification of audit planning :	Total allocation of auditor days for Lam Soon CU were: Mill = 6 days (5 days for safety and health, environment, mill best practices, GHG verification and Social at Mill) + (1 day for supply chain certification systems) Estate = 6 days for verification of safety and health, environment, good agriculture best practices, Social, HCV, TBP, Partial Certification and GHG verification plus the verification of Land History and Land Title. Combined with MSPO audit = 3 auditor days (extra).			
Name of peer reviewer :	NA			
Report approved by :	Kamini Sooriamoorthy		Approval date : 11/10/2023	

## RSPO PUBLIC SUMMARY

### SUMMARY OF INFORMATION

**TABLE 1**

	RA	ASA 1	ASA 2	ASA 3	ASA 4
<b>Projection Period</b>	<b>** July 2022 – June 2023</b>	<b>July 2023 – June 2024</b>			
<b>Certified FFB Processed (MT)</b>	126,941.00	130,779.00			
<b>Production of Certified CPO (MT)</b>	29,831.14	30,733.00			
<b>Production of Certified PK (MT)</b>	5,394.99	5,558.00			
<b>Certified Areas (Ha)</b>	5,885.00	5,885.00			
<b>Planted Areas (Ha)</b>	5,593.00	5,593.00			
<b>Production Areas (Ha)</b>	4,621.00	4,605.00			
<b>HCV Areas / Conservation Areas (Ha)</b>	122.00	122.00			
<b>REMARKS</b>	*The actual reporting period covered is from May 2022 – June 2023.				

*\*There shall be no gap in the projection period/reporting period.*

**TABLE 2**

	PO	PK
<b>Last years certified volume (MT)</b>	*35,351.14	*6,414.99
<b>Last years actual certified sold (MT)</b>	31,502.12	5,728.22
<b>Last years actual sold under other schemes (MT)</b>	-	-
<b>Last years sold conventional (MT)</b>	688.82	-
<b>Last year actual sold CSPO credits (where applicable)</b>	-	-
<b>New year certified volume (MT)</b>	30,733.00	5,558.00

*\*\*Volume extension approval date on 08/05/2023 i.e., CSPO – 5,520.00MT & CSPK – 1,020.00MT*

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## 1.0 AUDIT PROCESS

### 1.1 Certification Body

SIRIM QAS International Sdn. Bhd. is the leading certification, inspection and testing body in Malaysia. SIRIM QAS International provides a comprehensive range of certification, inspection and testing services which are carried out in accordance with internationally and nationally recognised standards. Attestation of this fact is the accreditation of the various certification and testing services by leading national and international accreditation and recognition bodies such as the Department of Standards Malaysia (STANDARDS MALAYSIA), the United Kingdom Accreditation Services (UKAS) and the International Automotive Task Force (IATF). SIRIM QAS International is a partner of IQNet, a network currently comprising of leading certification bodies in Europe, North and South America, East Asia and Australia.

SIRIM QAS International has vast experience in conducting audits related to RSPO certification. It has certified more than a hundred palm oil mills and several estates to ISO 14001 & ISO 45001. SIRIM QAS International has also conducted many audits for sustainable production of palm oil products against the requirements of the RSPO P&C. SIRIM QAS International was approved by the RSPO as a RSPO certification body on 21 March 2008 and re-accredited by ASI on 3 October 2019 (accredited 2014).

### 1.2 Qualification of audit team

Member of the Audit Team	Role/area of RSPO requirements	Qualifications
Rohazimi Mat Nawi	Trainee Lead Auditor / Safety & Environment	Hold B. Sc (Hons) Chemical_Gas Engineering from Universiti Teknologi Malaysia. He has been in the Plantations Industry with various companies having served in Palm Oil Mill. He was qualified in the auditing line with experienced in Sustainability, QMS, EMS, OHSMS and Supply Chain audit.
Mohd. Zulfakar Kamaruzaman	Auditor / Social External GAP, Supply Chain	Holds a B.Sc. Forestry. He had several years of working experience in oil palm operation. He is a qualified RSPO P&C and RSPO Supply Chain Lead Auditor.
Nor Ezani binti Ahmad	Auditor / Social internal & HCV	Holds a M.Sc. (by Research) in Advancement of Biodiversity and B.Sc. (hons) in Conservation Biology. She had experience in oil palm plantation sector and auditing since 2017.

### 1.3 Audit methodology

The audit covered the 1 palm oil mill and 1 estate (the only supply base). The sampling methodology applies for supply base with higher than four estates. The sampling shall be conducted in conformance with the requirement specified in the RSPO Certification Systems Document, Nov 2020. The supply base covered during the audit is Lam Soon Estate. The audit included an on-site audit to the estates, mill and settlers' houses to verify the implementation of the requirement of the certification. Interviews with the CU's management, employees, contractors and other relevant stakeholders were also conducted during the audit.

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### 1.4 Stakeholder Consultation

In summary, the stakeholders interviewed during the audit and the evidence from the stakeholder consultation carried out were as tabulated below.

Stakeholders interviewed	Evidence from stakeholder consultation
1) Employees / Workers Organizations (local / foreign / Orang Asli workers / male & female)	<ul style="list-style-type: none"> <li>a. Workers work 6 days a week with one rest day (Sunday). They work 8 hours with a minimum of 30 minutes' break in between.</li> <li>b. All workers confirmed that they receive a minimum of RM1500 per month. They receive their salaries before 7<sup>th</sup> of every month.</li> <li>c. Any overtime work is mutually agreed between workers and management, and that there is no element of forcing.</li> <li>d. Foreign workers are not subjected to any recruitment fee. Foreign workers kept their own passports and will only return the passport to office for renewal.</li> <li>e. Workers are generally satisfied with the way complaints lodged are acted upon. Delays in house repairs, if any, are usually due to the need to order repair parts.</li> <li>f. Workers, including foreign workers get to appoint their own representatives. There is no interference of influence exerted by the employer.</li> <li>g. For newly arrived foreign workers who did not understand Bahasa or English, translations are provided during briefings.</li> </ul>
2) Settlers	Not applicable. There are no settlers living inside and in vicinity of LSPSB CU.
3) Villagers / Local communities (including women representatives, displaced communities)	Not applicable. LSPSB CU is surrounded by Private stakeholder. The nearest local communities are located more than 10 km from LSPSB plantation boundaries. No local communities share boundaries with LPSB CU.
4) Suppliers	No issue raised. Payments are received in time.
5) Contract workers (local / foreign / Orang Asli workers / male & female)	Verification through employment contract and payslip of contractor's workers (FFB Transporter). A major non-conformance raised under 6.2.3
6) Local & national NGOs	Not available for this audit.
7) Government agencies / Statutory bodies	No complaints received.
8) Independent growers / Smallholders	Not applicable. LSPSB is surrounded by other plantations. Independent growers and small holders are located at a distance more than 10 km away from LSP CU boundaries. LSPSB plantation boundary is not shared between independent growers and small holders.
9) Indigenous people	Not applicable. There are no indigenous people living within or in vicinity of LSP CU

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10) Contractor	No issues raised by contractors. Terms in the contract are understood by the contractors and followed by the CU.
11) Previous land owner (if any)	There are no issues raised by previous land owner.
12) Others (please specify)	Not applicable.

1.5 Audit plan : Refer to Attachment 2

1.6 Date of next audit : The next surveillance audit will be conducted within 12 months but not sooner than 9 months from this audit. (For RA, the next RA will be conducted at least 4 months prior to expiry date of the certificate)

## 2.0 SCOPE OF CERTIFICATION AUDIT

### 2.1 Description of the certification unit

The Lam Soon Plantations Sdn Bhd. (hereafter referred to as LSPSB) is one of the subsidiary under the Lam Soon (M) Bhd. The company was incorporated in 1978 as Pacific Cocoa Plantations Sdn. Bhd., which was then changed to Lam Soon Plantations Sdn. Bhd. in July 2000. The core business of Lam Soon Plantations Sdn. Bhd. is oil palm plantation. Currently, LSPSB had only oil palm estates and palm oil mill. The oil palm estate and mill is located in Lahad Datu, Sabah, East Malaysia. The Lam Soon Estate consisted of two divisions; the KK estate division and the KL estate division. The palm oil mill commenced operations in 1997 with a processing capacity of 45 metric tonnes of fresh fruit bunches (FFB) per hour. The estate had been fully developed before the year of 2005.

### 2.2 Description of the Supply Base (including the planting profile)

The FFBs sourced from company owned estate i.e., Lam Soon Estate that is certified. Details of the FFB contribution from each source to the Lam Soon POM are shown in the following tables:

**Table 1: Actual FFB production by the supply base for the reporting period May 2022- June 2023**

CU own estates	FFB Contribution		Certifying CB
	Tonnes	Percentage (%)	
Lam Soon Estate	139,292.98	100	SIRIM
Grand Total	139,292.98	100	

**Table 2: Projected FFB production by the supply base for next reporting period  
July 2023 to June 2024**

CU own estates	FFB Contribution		Certifying CB
	Tonnes	Percentage (%)	
Lam Soon Estate	130,799.00	100	SIRIM
Grand Total	130,799.00	100	

## RSPO PUBLIC SUMMARY

**Table 3: Actual FFB received and CPO & PK dispatch by Lam Soon POM for period from May 2022- June 2023**

RSPO Supply Chain Model : Identity Preserved	Total (MT)
FFB Received	139,292.98
FFB Processed	139,292.98
CPO Production	32,405.54
PK Production	5,728.22
CPO delivered as RSPO certified	31,502.12
CPO delivered under other schemes (MT)	-
CPO delivered as non-RSPO certified	688.82
PK delivered as RSPO certified	5,728.22
PK delivered under other schemes (MT)	-
PK delivered as non-RSPO certified	-
CPO/PK sold as credits	-

**Table 4: Projected FFB received and CPO & PK dispatch by Lam Soon POM of next reporting period July 2023 to June 2024**

RSPO Supply Chain Model : Identity Preserved	Total (MT)
FFB Received	130,779.00
FFB Processed	130,779.00
CPO Production	30,733.00
PK Production	5,558.00

**Table 5 Planted and certified area of the CU**

Estate	Planted (ha)	Certified (ha)
Lam Soon Plantations Sdn. Bhd	5,593.00	5,885.00
<b>Total</b>	<b>5,593.00</b>	<b>5,885.00</b>

**Table 6 Planting profile for Lam Soon Estate**

Year of planting	Planting cycle (1st, 2nd, 3rd, etc. Generation)	Mature / Immature	Planted area(ha)	Percentage of planted area (%)
1994	1 <sup>st</sup>	Mature	285	5.10
2010	2 <sup>nd</sup>	Mature	560	10.01
2011	2 <sup>nd</sup>	Mature	344	6.15
2012	2 <sup>nd</sup>	Mature	443	7.92
2013	2 <sup>nd</sup>	Mature	425	7.60
2014	2 <sup>nd</sup>	Mature	486	8.69
2015	2 <sup>nd</sup>	Mature	460	8.23
2016	2 <sup>nd</sup>	Mature	428	7.65
2017	2 <sup>nd</sup>	Mature	381	6.81
2018	2 <sup>nd</sup>	Mature	413	7.38
2019	2 <sup>nd</sup>	Mature	380	6.79



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2020	2 <sup>nd</sup>	Immature	301	5.38
2021	2 <sup>nd</sup>	Immature	251	4.49
2022	2 <sup>nd</sup>	Immature	436	7.80
<b>Total</b>			<b>5,593</b>	<b>100</b>

### 2.3 Organizational Information/Contact Person(s)

The details of the contact person are as below:

Name	:	Mr. Lim Chan Khoon
Position	:	Plantation Director
Address	:	Lam Soon Management Service Sdn Bhd Lavel 3, Wisma DLS No.6 Jalan Jurunilai U1/20 Hicom-Glenmarie Industrial Park Shah Alam 40150 Selangor Darul Ehsan
Phone no.	:	+6019-3251961
Fax no.	:	+603-55693604
Email	:	chankhoon@gmail.com

### 3.0 AUDIT FINDINGS

#### 3.1 Changes to certified products in accordance to the production of the previous year

No change to certified product since last audit.

#### 3.2 Progress and changes in time bound plan (Refer to Attachment 6 for the time bound plan)

- i. Have all the estates under the parent company been certified? ☒ Yes ☐ No

If no, comments on the organization's compliance with the RSPO partial certification rules :

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- ii. Are there any changes to the organization's time bound plan? ☐ Yes ☒ No

If yes, comment in terms of acceptance or non acceptance on the changes in the time-bound plan?

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iii. Are there associated smallholders (including scheme smallholders) in the CU ☐ Yes ☒ No

If yes, have ALL the associated smallholders (including scheme smallholders) where their fruit supply is included, by the mill, in its certification? ☐ Yes ☒ No

If no, please state reasons \_\_\_\_\_

iv. Any new acquisition which has replaced primary forests or HCV areas ☐ Yes ☒ No

3.3 Other changes (e.g. organizational structure, new contact person, addresses, etc.)

No change.

3.4 Status of previous non-conformities \* ☒ Closed ☐ Not closed\*  
\* If not closed, minor non conformity will be upgraded to major non conformity

3.5. Complaint received from stakeholder (if any)

No significant complaints from stakeholders were observed.

### 4.0 DETAILS OF NON-CONFORMITY REPORT

4.1 For P&C (Details checklist refer to Attachment 3) :

Total no. of minor NCR(s) List : RMN 01

Total no. of major NCR(s) List : NEA 01

4.2 For SC (Details checklist refer to Attachment 3) :

Total no. of minor NCR(s) List : -

Total no. of major NCR(s) List :-

### 5.0 AUDIT CONCLUSION

The audit team concludes that the organization has established and maintained its management system in line with the RSPO P&C requirements of the standard and demonstrated the ability of the system to systematically achieve agreed criterion & requirements.

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### 6.0 RECOMMENDATION

☐

No NCR recorded. Recommended to continue certification.

☒

Minor NCR(s) recorded. Corrective action plan has been accepted. Verification of the NCR(s) to be carried out in the next audit.

*Note: Minor NCRs raised in the audit which are not addressed in the subsequent audit shall be upgraded to major NCRs .*

☒

Major NCR(s) recorded. Evidence of implementation of the corrective actions have been provided and accepted by the audit team. The NCR(s) have been satisfactorily closed out.

☒

Recommended to continue certification.

☐

Major NCR(s) recorded. Evidence of implementation of the corrective actions have been provided but not fully accepted by the audit team. NCR(s)..... have not been satisfactorily closed out within 90 days of the audit. Recommended for suspension of the certificate.

*Note: Major NCRs which are not addressed within a further 90 days shall result in the certificate being withdrawn.*

### 7.0 IT IS CONFIRMED THAT ALL CORRECTIVE ACTIONS TAKEN ON MAJOR NON-CONFORMITIES HAVE BEEN SATISFACTORILY REVIEWED, ACCEPTED AND VERIFIED AND ALL CORRECTIVE ACTIONS PLANS PROVIDED ON MINOR NON CONFORMITIES HAVE BEEN SATISFACTORILY REVIEWED AND ACCEPTED. RECOMMENDED FOR CONTINUATION OF RSPO P & C CERTIFICATION.

Audit Team Leader : ROHAZIMI MAT NAWI



6/10/2023

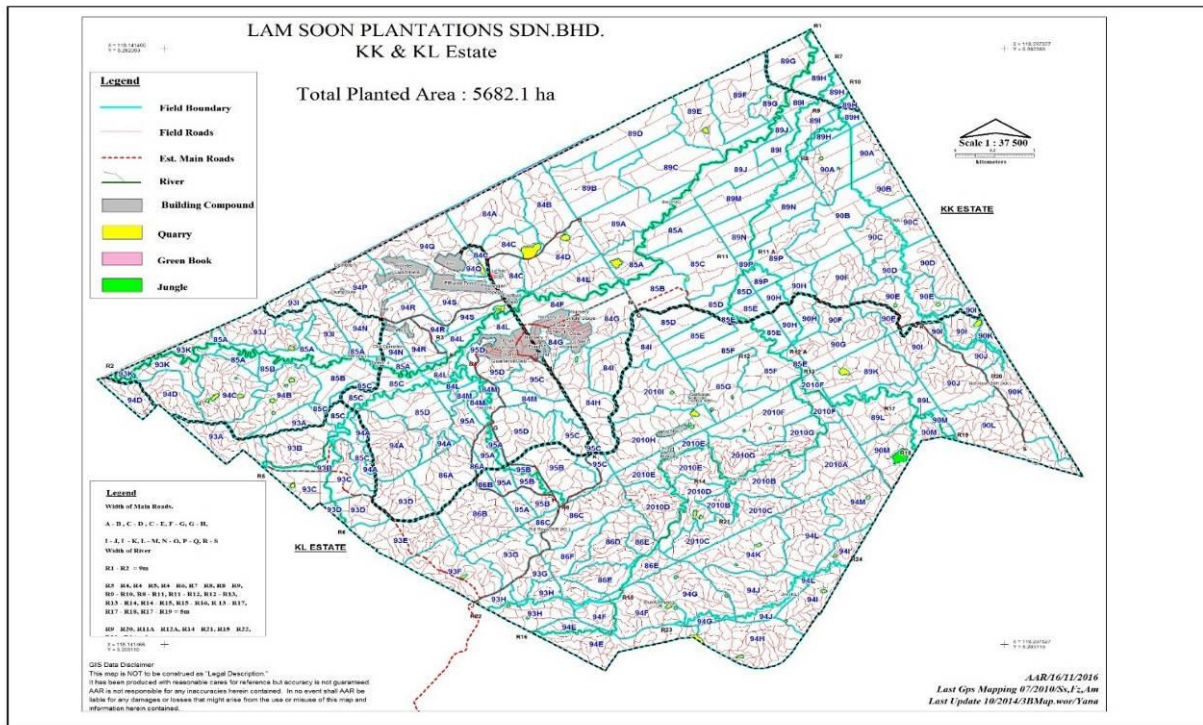
(Name)

(Signature)

(Date)

# RSPO PUBLIC SUMMARY

## Attachment 1 - Map



Attachment 2 – Audit Plan

1.0 Objectives

The objectives of the audit are as follows:

- (i) To determine Certification Unit conformance against the relevant certification standards.
- (ii) To verify the effective implementation of corrective actions arising from the findings of last audit.
- (iii) To make appropriate recommendations based on the audit findings.

2.0 Date of assessment : 3-7/7/2023

3.0 Site of assessment : 1.Lam Soon Palm Oil Mill  
2.Lam Soon Estate

4.0 Reference Standard :

- a. MYNI 2019 of RSPO P&C 2018 / ~~RSPO Independent Smallholder Standard, Nov 2019 / RSPO Management System Requirements and Guidance for Group Certification of FFB Production, March 2018~~
- b. RSPO Certification System Documents Nov 2020
- c. Company's audit criteria including Company's Manual/Procedures

5.0 Assessment Team

Trainee Lead Assessor :Rohazimi Mat Nawi (RMN) – (Enviroment, Safety, Metric Template, GHG)  
Auditor :Mohd Zulfakar Kamaruzaman (MZK) (External Social, GAP, SC)  
:Nor Ezani Ahmad – ( Social , HCV , TBP)

*If there is any objection to the proposed audit team, the organization is required to inform the Lead Auditor/RSPO Section Manager.*

6.0 Audit Method

Site audits or field checks including observation of practices, interviews with internal and external stakeholders and interested parties (employees, nearby population, etc.), documentation review and evaluation of records.

7.0 Audit Findings

Audit findings shall be classified as major and/or minor. Major non conformities shall be addressed within 90 days or else the certificate shall be suspended. If the major non conformities are still not addressed within another 90 days, the certificate shall be terminated.

If there are five or more major non-compliances within one Principle found during the audit, immediate suspension of RSPO certification shall be recommended.

For minor non conformities raised in the surveillance audit, corrective action shall be verified in the next audit. These shall be upgraded to major non conformities if the corrective actions are not satisfactory implemented in the next audit.

8.0 RSPO 2018 Principles and Criteria (P&C) Metrics Template

The RSPO 2018 Principles and Criteria (P&C) Metrics Template outlines a set of strategic outcome-based metrics relating directly to the RSPO P&C and is aligned with the RSPO Theory of Change. This Metrics Template comes into effect on 1 June 2021 and all audits against the 2018 P&C or the relevant National Interpretation conducted from 1 June 2021 onwards shall prepare and submit this Metrics Template for the audit team to review during audit.

Please submit the Metrics Template to Lead Auditor according to this period:

- a) Reporting time frames for economic data are:
  - i. Calendar year (January to December): January 2022 to December 2022, and
  - ii. 12 month period counting up to two months before audit month: May 22 to Apr 2023
- b) Reporting time frames for demographic data:
  - i. For mill and estate workers: as of 31 December 2022
  - ii. For smallholders and outgrowers: January 2022 to December 2022
- c) Reporting time frame for all other social and environmental data: January 2022 to December 2022

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The updated Metrics Template (as attached, the version 2.0) will be enforced from 1 August 2021. For audits conducted during the transition period from 1 June to 31 July 2021, members are encouraged to use the updated version but are also allowed to use the previous version (version 1.0). All audits conducted from 1 August 2021 onwards must use the updated Metrics Template (version 2.0).

### 9.0 Confidentiality Requirements

SIRIM QAS International shall not disclose any information concerning the company regarding all matters arising or coming to its attention with the conduct of the programme, which is of confidential in nature other than information, which is in the public domain.

In the event that there be any legal requirements for disclosing any information concerning the organization, SIRIM QAS International shall inform the organization of the information to be disclosed.

10. **Working Language** : English and Bahasa Malaysia

### 11. Reporting

- |    |                        |   |   |
|----|------------------------|---|---|
| a. | Language               | : | English   |
| b. | Format                 | : | Verbal and written  |
| c. | Expected date of issue | : | 2 weeks after the closure of the Major NC / or if only minor NC, 30 days from the last day of this audit. |

### 12. Facilities Required

- |    |  |
|----|--|
| a. | Room for discussion                        |
| b. | Relevant document and record               |
| c. | Personnel protective equipment if required |
| d. | Photocopy facilities                       |
| e. | A guide for each group                     |

13. **Assessment Programme Details** : As below

## RSPO PUBLIC SUMMARY

### Day 1: 3 July 2022 (Monday)

Time	Activities / areas to be visited			Auditee
9.00am	Opening Meeting – Audit team introduction and briefing on assessment objectives, scope, methodology, criteria and programmes by SIRIM QAS Audit Team Leader. : venue : <b>(Decided by Management)</b>			Management Representative
9.30am	Organization Representative - Briefing on RSPO implementation, significant change on organization activity, structure, certified areas, machinery, FFB supply bases, Time bound plan, actions taken to address previous audit findings. Logistics discussion to the sites to be visited.			
10.00am	To assign each audit team members – site and the P&C requirements			
	<b>RMN (POM)</b>	<b>NEA (POM)</b>	<b>MZK (POM)</b>	Guide(s) for each auditor
	<b>Coverage of assessment: P1, P2, P3, P4, P6, P7:</b>  <ul style="list-style-type: none"><li>▪ Laws and regulations</li><li>▪ Waste management including disposal site</li><li>▪ Aspects/impacts of mill management</li><li>▪ Controlled/open burning</li><li>▪ Pollution mitigating plans</li><li>▪ River system and Effluent Treatment/Discharge</li><li>▪ Management and disposal of waste including pesticides containers</li><li>▪ Training and skill development programs</li><li>▪ Waste &amp; chemical management</li><li>▪ Interview with workers, safety committee and contractors</li><li>▪ Facilities at workplace</li><li>▪ Occupational safety &amp; health practice witness activities at site</li><li>▪ Hazard identification and Risk Management</li><li>▪ GHG assessment</li></ul> Other area identified during the assessment including site visits Facilities at workplace (water treatment plant, clinic, stores, workshop, landfill area & etc)	<b>Coverage of assessment: P1, P2, P3, P4, P6, P7:</b>  <ul style="list-style-type: none"><li>▪ Social aspects - SIA, management plan &amp; implementation, workers' quarters.</li><li>▪ Interview with gender committee, worker representative, etc</li><li>▪ Linesite inspection</li><li>▪ Complaints and grievances</li><li>▪ Workers Issues &amp; welfare</li><li>▪ Training and skill development programs</li><li>▪ Time bound plan and uncertified management units</li></ul> Other area identified during the assessment including site visits to relevant indicators such as estates and mill operation, line site, clinics, creche, Humana and etc.	<b>Site visit and assessment on Supply Chain Implementation including the:</b>  <ul style="list-style-type: none"><li>▪ Model used</li><li>▪ General Chain of Custody</li><li>▪ System Requirements</li><li>▪ for the supply chain</li><li>▪ Documented procedures</li><li>▪ Purchasing and goods in</li><li>▪ Outsourcing activity</li><li>▪ Sales and goods out</li><li>▪ Processing</li><li>▪ Records keeping</li><li>▪ Registration</li><li>▪ Training</li><li>▪ Claims</li></ul>	
1.00pm	<b>LUNCH BREAK / ZUHUR PRAYER</b>			All
2.00pm	Continue assessment at POM			
4.30 - 5.00pm	Audit team discussion / Debrief meeting with client on issues (if any) / End of Day 1 audit			All
9.00 – 9.30pm	Discussion on potential NCRs			Audit team only

## RSPO PUBLIC SUMMARY

### Day 2: 4 July 2022 (Tuesday)

Time	Activities / areas to be visited			Auditee
9.00am	Overview of current activities at Supply base sites. To assign each audit team members – site and the P&C requirements			Respective Manager
9.30am	To assign each audit team members – site and the P&C requirements			Guide(s) for each auditor
	<b>RMN (POM)</b>	<b>NEA (POM)</b>	<b>MZK (POM)</b>	
	<b>Coverage of assessment: P1, P2, P3, P4, P6, P7:</b> <ul style="list-style-type: none"> <li>▪ Laws and regulations</li> <li>▪ Waste management including disposal site</li> <li>▪ Aspects/impacts of mill management</li> <li>▪ Controlled/open burning</li> <li>▪ Pollution mitigating plans</li> <li>▪ River system and Effluent Treatment/Discharge</li> <li>▪ Management and disposal of waste including pesticides containers</li> <li>▪ Training and skill development programs</li> <li>▪ Waste &amp; chemical management</li> <li>▪ Interview with workers, safety committee and contractors</li> <li>▪ Facilities at workplace</li> <li>▪ Occupational safety &amp; health practice witness activities at site</li> <li>▪ Hazard identification and Risk Management</li> <li>▪ GHG assessment &amp; metric template verification</li> </ul> <p>Site visit at POM Water treatment plant Effluent treatment plant MDS plant Workshop Scheduled waste store POL Store Lab</p>	<b>Coverage of assessment: P1, P2, P3, P4, P6, P7:</b> <ul style="list-style-type: none"> <li>▪ Social aspects - SIA, management plan &amp; implementation, workers' quarters.</li> <li>▪ Interview with gender committee, worker representative, etc</li> <li>▪ Linesite inspection</li> <li>▪ Complaints and grievances</li> <li>▪ Workers Issues &amp; welfare</li> <li>▪ Training and skill development programs</li> <li>▪ Time bound plan and uncertified management units</li> </ul> <p>Other area identified during the assessment including site visits to relevant indicators such as estates and mill operation, line site, clinics, creche, Humana and etc.</p>	<b>Coverage of assessment: P1, P2, P3, P4, P6, P7:</b> <ul style="list-style-type: none"> <li>▪ Land titles user rights</li> <li>▪ Mill Boundary, adjacent and neighbouring land use</li> <li>▪ Stakeholder consultation with affected communities surrounding the CU</li> <li>▪ Interview with contractors, supplier, etc</li> <li>▪ Consultation with relevant government agencies</li> <li>▪ Training and skill development programs</li> <li>▪ Mill best practices</li> </ul> <p>Other area identified during the assessment including site visits to mill operation and estates operation such as sterilizer, grading, nursery, harvesting, spraying and etc.</p>	
1.00pm	<b>LUNCH BREAK / ZUHUR PRAYER</b>			All
2.00pm	Continue assessment at POM/Estate			
4.30 - 5.00pm	Audit team discussion / Debrief meeting with client on issues (if any) / End of Day 2 audit			All
9.00 – 10.00pm	Discussion on finalization of draft NCRs			Audit team only



## RSPO PUBLIC SUMMARY

### Day 3: 5 July 2022 (Wednesday)

Time	Activities / areas to be visited			Auditee
9.00am	Overview of current activities at Supply base sites. To assign each audit team members – site and the P&C requirements			Respective Manager
9.30am	To assign each audit team members – site and the P&C requirements			Guide(s) for each auditor
	<b>RMN (Estate)</b>	<b>NEA (Estate)</b>	<b>MZK (Estate)</b>	
	<b>Coverage of assessment: P1, P2, P3, P4, P6, P7:</b> <ul style="list-style-type: none"> <li>▪ Laws and regulations</li> <li>▪ Waste management including disposal site</li> <li>▪ Aspects/impacts of mill management</li> <li>▪ Controlled/open burning</li> <li>▪ Pollution mitigating plans</li> <li>▪ River system and Effluent Treatment/Discharge</li> <li>▪ Management and disposal of waste including pesticides containers</li> <li>▪ Training and skill development programs</li> <li>▪ Waste &amp; chemical management</li> <li>▪ Interview with workers, safety committee and contractors</li> <li>▪ Facilities at workplace</li> <li>▪ Occupational safety &amp; health practice witness activities at site</li> <li>▪ Hazard identification and Risk Management</li> <li>▪ GHG assessment &amp; metric template verification</li> </ul> <p>Other area identified during the assessment including site visits Facilities at workplace (water treatment plant, effluent treatment plant, chemical nas scheduled waste stores, workshop, landfill area &amp; etc)</p>	<b>Coverage of assessment: P1, P2, P3, P4, P6, P7:</b> <ul style="list-style-type: none"> <li>▪ Social aspects - SIA, management plan &amp; implementation, workers' quarters.</li> <li>▪ Interview with gender committee, worker representative, etc</li> <li>▪ Linesite inspection</li> <li>▪ Complaints and grievances</li> <li>▪ Workers Issues &amp; welfare</li> <li>▪ Training and skill development programs</li> <li>▪ HCV/RTE and action plan</li> <li>▪ Time bound plan and uncertified management units</li> </ul> <p>Other area identified during the assessment including site visits to relevant indicators such as estates and mill operation, line site, clinics, creche, Humana and etc.</p>	<b>Coverage of assessment: P1, P2, P3, P4, P6, P7:</b> <ul style="list-style-type: none"> <li>▪ Land titles user rights</li> <li>▪ Estate Boundary, adjacent and neighbouring land use</li> <li>▪ Stakeholder consultation with affected communities surrounding the CU</li> <li>▪ Interview with contractors, supplier, etc</li> <li>▪ Consultation with relevant government agencies</li> <li>▪ Training and skill development programs</li> <li>▪ Local communities and stakeholders</li> <li>▪ Local sustainable development</li> <li>▪ Support smallholder inclusion</li> <li>▪ Commitment to long-term economic and financial viability</li> <li>▪ Good Agricultural Practice- witness activities at site (weeding/ spraying, etc)</li> <li>▪ EFB mulching, POME application</li> <li>▪ Plantation on hilly/swampy area</li> <li>▪ IPM implementation, training and safe use of agro-chemicals.</li> <li>▪ New planting</li> </ul> <p>Other area identified during the assessment including site visits to mill operation and estates operation such as sterilizer, grading, nursery, harvesting, spraying and etc.</p>	
1.00pm	<b>LUNCH BREAK / ZUHUR PRAYER</b>			All
2.00pm	Continue assessment at POM/Estate			
4.30 - 5.00pm	Audit team discussion / Debrief meeting with client on issues (if any) / End of Day 3 audit			All
9.00 – 10.00pm	Discussion on finalization of draft NCRs			Audit team only

## RSPO PUBLIC SUMMARY

### Day 4: 6 July 2022 (Thursday)

Time	Activities / areas to be visited			Auditee
9.00am	Overview of current activities at Supply base sites. To assign each audit team members – site and the P&C requirements			Respective Manager
9.30am	To assign each audit team members – site and the P&C requirements			Guide(s) for each auditor
	<b>RMN (Estate)</b>	<b>NEA (Estate)</b>	<b>MZK (Estate)</b>	
	<b>Coverage of assessment: P1, P2, P3, P4, P6, P7:</b> <ul style="list-style-type: none"> <li>Laws and regulations</li> <li>Waste management including disposal site</li> <li>Aspects/impacts of mill management</li> <li>Controlled/open burning</li> <li>Pollution mitigating plans</li> <li>River system and Effluent Treatment/Discharge</li> <li>Management and disposal of waste including pesticides containers</li> <li>Training and skill development programs</li> <li>Waste &amp; chemical management</li> <li>Interview with workers, safety committee and contractors</li> <li>Facilities at workplace</li> <li>Occupational safety &amp; health practice witness activities at site</li> <li>Hazard identification and Risk Management</li> <li>GHG assessment &amp; metric template verification</li> </ul> Other area identified during the assessment including site visits Facilities at workplace (water treatment plant, effluent treatment plant, chemical nas scheduled waste stores, workshop, landfill area & etc)	<b>Coverage of assessment: P1, P2, P3, P4, P6, P7:</b> <ul style="list-style-type: none"> <li>Social aspects - SIA, management plan &amp; implementation, workers' quarters.</li> <li>Interview with gender committee, worker representative, etc</li> <li>Linesite inspection</li> <li>Complaints and grievances</li> <li>Workers Issues &amp; welfare</li> <li>Training and skill development programs</li> <li>HCV/RTE and action plan</li> <li>Time bound plan and uncertified management units</li> </ul> Other area identified during the assessment including site visits to relevant indicators such as estates and mill operation, line site, clinics, creche, Humana and etc.	<b>Coverage of assessment: P1, P2, P3, P4, P6, P7:</b> <ul style="list-style-type: none"> <li>Land titles user rights</li> <li>Estate Boundary, adjacent and neighbouring land use</li> <li>Stakeholder consultation with affected communities surrounding the CU</li> <li>Interview with contractors, supplier, etc</li> <li>Consultation with relevant government agencies</li> <li>Training and skill development programs</li> <li>Local communities and stakeholders</li> <li>Local sustainable development</li> <li>Support smallholder inclusion</li> <li>Commitment to long-term economic and financial viability</li> <li>Good Agricultural Practice- witness activities at site (weeding/ spraying, etc)</li> <li>EFB mulching, POME application</li> <li>Plantation on hilly/swampy area</li> <li>IPM implementation, training and safe use of agro-chemicals.</li> <li>New planting</li> </ul> Other area identified during the assessment including site visits to mill operation and estates operation such as sterilizer, grading, nursery, harvesting, spraying and etc.	
1.00pm	<b>LUNCH BREAK / ZUHUR PRAYER</b>			All
2.00pm	Continue assessment at POM/Estate			
4.30 - 5.00pm	Audit team discussion / Debrief meeting with client on issues (if any) / End of Day 4 audit			All
9.00 – 10.00pm	Discussion on finalization of draft NCRs			Audit team only

## RSPO PUBLIC SUMMARY

### Day 5: 7 July 2022 (Friday)

Time	Activities / areas to be visited			Auditee
8.00am	Overview of current activities at Supply base sites. To assign each audit team members – site and the P&C requirements			Respective Manager
8.30am	<b>To Continue unfinish assessment at POM/Estate – each auditor will brief which estate or mill will sample during the audit</b>			Guide(s) for each auditor
	<b>RMN</b>	<b>NEA</b>	<b>MZK</b>	
	<b>Coverage of assessment: P1, P2, P3, P4, P6, P7:</b> <ul style="list-style-type: none"> <li>▪ Laws and regulations</li> <li>▪ Waste management including disposal site</li> <li>▪ Aspects/impacts of mill management</li> <li>▪ Controlled/open burning</li> <li>▪ Pollution mitigating plans</li> <li>▪ River system and Effluent Treatment/Discharge</li> <li>▪ Management and disposal of waste including pesticides containers</li> <li>▪ Training and skill development programs</li> <li>▪ Waste &amp; chemical management</li> <li>▪ Interview with workers, safety committee and contractors</li> <li>▪ Facilities at workplace</li> <li>▪ Occupational safety &amp; health practice witness activities at site</li> <li>▪ Hazard identification and Risk Management</li> <li>▪ GHG assessment &amp; metric template verification</li> </ul> Other area identified during the assessment including site visits Facilities at workplace (water treatment plant, effluent treatment plant, chemical nas scheduled waste stores, workshop, landfill area & etc)	<b>Coverage of assessment: P1, P2, P3, P4, P6, P7:</b> <ul style="list-style-type: none"> <li>▪ Social aspects - SIA, management plan &amp; implementation, workers' quarters.</li> <li>▪ Interview with gender committee, worker representative, etc</li> <li>▪ Linesite inspection</li> <li>▪ Complaints and grievances</li> <li>▪ Workers Issues &amp; welfare</li> <li>▪ Training and skill development programs</li> <li>▪ HCV/RTE and action plan</li> <li>▪ Time bound plan and uncertified management units</li> </ul> Other area identified during the assessment including site visits to relevant indicators such as estates and mill operation, line site, clinics, creche, Humana and etc.	<b>Coverage of assessment: P1, P2, P3, P4, P6, P7:</b> <ul style="list-style-type: none"> <li>▪ Land titles user rights</li> <li>▪ Estate Boundary, adjacent and neighbouring land use</li> <li>▪ Stakeholder consultation with affected communities surrounding the CU</li> <li>▪ Interview with contractors, supplier, etc</li> <li>▪ Consultation with relevant government agencies</li> <li>▪ Training and skill development programs</li> <li>▪ Local communities and stakeholders</li> <li>▪ Local sustainable development</li> <li>▪ Support smallholder inclusion</li> <li>▪ Commitment to long-term economic and financial viability</li> <li>▪ Good Agricultural Practice- witness activities at site (weeding/ spraying, etc)</li> <li>▪ EFB mulching, POME application</li> <li>▪ Plantation on hilly/swampy area</li> <li>▪ IPM implementation, training and safe use of agro-chemicals.</li> <li>▪ New planting</li> </ul> Other area identified during the assessment including site visits to mill operation and estates operation such as sterilizer, grading, nursery, harvesting, spraying and etc.	
12.00pm	<b>LUNCH BREAK / JUMAAT PRAYER</b>			All
2.00pm	Continue assessment at POM/Estate			
3.30 - 4.00pm	Audit team discussion / Debrief meeting with client on issues (if any) / End of Day 5 audit			All
4.00 – 5.00pm	<ul style="list-style-type: none"> <li>• Closing meeting – venue at <b>(decide by management)</b>, Presentation of audit findings, positive comment, Question &amp; answer</li> </ul>			All

## RSPO PUBLIC SUMMARY

Attachment 3

### RSPO P&C AUDIT CHECKLIST AND FINDINGS (MYNI 2019 FOR RSPO P&C 2018)

#### **Principle 1: Behave ethically and transparently**

Drive ethical business behaviour, build trust and transparency with stakeholders to ensure strong and healthy relationships.

Clause	Indicators	Comply Yes/No	Findings
1.1 The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.	1.1.1 (C) Documents that are specified in the RSPO P&C are made available to the public.	Yes	LSP CU continued to use the internet to disseminate public information relating to land titles, human rights, FPIC, safety and health plans, pollution prevention plans and the procedure for complaints and grievances. The LSP website address is <a href="http://lamsoonplantations.com.my">http://lamsoonplantations.com.my</a> .
	1.1.2 Information is provided in appropriate languages and accessible to relevant stakeholders.	Yes	LSP CU has continued to use their website for disseminating public information. Information relating to land titles, policies, environmental, social and/or legal, complaints and grievances are available at <a href="http://lamsoonplantations.com.my">http://lamsoonplantations.com.my</a> . The information provided on the website are in appropriate language (English) and accessible to relevant stakeholders. The verified website provides columns to enable request and feedback from the public ensuing LSP CU's response.
	1.1.3 (C) Records of requests for information and responses are maintained.	Yes	The LSP CU continued to maintain the records of requests for information and CU's responses in corresponding files. Correspondence with relevant stakeholders such as government agencies, schools, local communities were sighted by the auditor. Management documents relating to environment, social and legal issues, were available to the public except for those prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.
	1.1.4 (C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.	Yes	LSP CU pledge to Communication Policy signed by the Plantation Director. LSP CU too has developed a Standard Operating Procedure (SOP) on Stakeholder Consultation and also Consultation and Grievances Communication Procedure Internal/External records. It contains procedures for consultation and discussions, solving issues/grievances, records and improvements, which is the responsibility of the Manager and Assistant Manager. It also stipulates that issues and grievances can be raised via comments, complaints, or request for information, and that all issues are to be resolved fairly and within the stipulated timeframe. The procedure was communicated to relevant stakeholders during external stakeholders' consultation on 23 May 2023 which held at LSP Training Centre.
	1.1.5 There is a current list of contact and details of stakeholders and their nominated representatives.	Yes	LSPPOM and LS Estate maintained their own stakeholder list and updated accordingly whenever necessary and should there be any changes. Information maintained includes name of parties, address, contact number, nominated representatives. The lists include Internal and External stakeholders.
1.2 The unit of certification commits to ethical conduct in all business operations and	1.2.1 A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.	Yes	The documented policy committing ethical conduct was available in the 'HR Policies and Procedures Code of Conduct'. Among the contents of the Policy include the following: <ul style="list-style-type: none"> <li>• Dealing fairly with customers, suppliers, contractors, competitors and other employees;</li> <li>• Avoid situations of conflict of interests between personal interest and interests of the Company;</li> <li>• Not to be influenced by receiving favours, and not to influence by giving favours;</li> <li>• Not to accept any kinds of bribes or kickbacks or other unlawful or unethical benefits</li> </ul>

## RSPO PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
transactions.	1.2.2 A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.	Yes	The 'HR Policies and Procedures Code of Conduct' which had been developed to outline the standards of behaviour required. The ethical conduct applies to all its suppliers, consultants, agents, contractors/service providers who have direct dealings with the Lam Soon Group. Internal audit has been used as mechanism to check consistent on implementation of the policy and overall ethical business practice. Evidence of legal due diligence carried out include all vendors undertaking compliance with all laws and regulations relating to anti-bribery, fraud and corruption, company ethics and management practices as well as declaration to eradicate all forms of exploitation, including but not limited to modern day slavery and human trafficking.

### **Principle 2: Operate legally and respect rights**

Implement legal requirements as the basic principles of operation in any jurisdiction.

Clause	Indicators	Comply Yes/No	Findings
2.1 There is compliance with all applicable local, national and ratified international laws and regulations.	2.1.1 (C) The unit of certification complies with applicable legal requirements.	Yes	In general, the CU complies to applicable legal requirements.
	2.1.2 A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.	Yes	Changes to the law and regulation were monitored by the sustainability manager/officer through procedure "LSP Sdn Bhd System for tracking Changes. Various sources were referred to in obtaining information about the updates of legal requirements. This includes checking with the industrial association (e.g. MPOA, EMPA, SECA, etc.), attending seminar/conference, buying of the law books, government agencies websites, etc. The CU maintained documented system for identifying and tracking the updates of the applicable legal requirements through various media such as LawNet, internet, newsletter, etc. The legal register management noted had been updated accordingly. All the new amendments of applicable regulations were included in the legal register. The latest update was in May 2023.
	2.1.3 Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.	Yes	Boundary stones / markers along the legal boundaries observed visibly maintained by the CU. Auditor has verified the boundary stone and pegs at Lam Soon Estate, it has been observed that the boundary stones were visibly maintained between the estate with the neighboring private oil palm plantations.
2.2 All contractors providing operational services and	2.2.1 A list of contracted parties is maintained.	Yes	All contractors providing operational services have been listed in "Stakeholder List" was reviewed and sighted during the audit at both POM and Estate. The list of contracted parties is maintained by each unit in its respective stakeholder list. The lists contain the names of contractors, designated contact persons, address, telephone/fax/email, and type of contracted work done.

## RSPO PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
supplying labour and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.	2.2.2 All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/accredited) for migrant workers, service providers and labour contractors, is available.	Yes	Each contract issued to suppliers and contractors contain a clause requiring compliance with legal requirements. Sighted during the audit were contracts between with crude palm oil and palm kernel transporters, FFB Transporter, FFB Harvesting, Grass cutting, Garbage transporter, and vendors were added with an addendum containing a provision that the contractors shall comply with the provisions of the relevant Acts, regulations, and by-laws. Evidence of legal due diligence carried out include all vendors undertaking compliance with rules relating to labour and human rights, company ethics and management practices, and compliance with all laws and regulations relating to anti-bribery, fraud, and corruption.
	2.2.3 All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.	Yes	All contracts sampled at LSP CU contain a clause on no child, forced and trafficked labour. This is stipulated under Addendum of the Agreements which states that the Contractor shall not use or promote use of child labour, forced, bonded labour or human trafficking.
2.3 All FFB supplies from outside the unit of certification are from legal sources.	2.3.1 (C) For all directly sourced FFB, the mill requires: <ul style="list-style-type: none"> <li>Information on geo-location of FFB origins.</li> <li>Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder</li> <li>One or more supporting documents for claims</li> <li>Valid MPOB license</li> </ul>	Yes	LSP POM is currently had records for the following for the directly source of FFB: <ul style="list-style-type: none"> <li>a) Information on geo-location of FFB origins.</li> <li>b) Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder</li> </ul> <p>As of to date, no Smallholder/Grower are sending their FFB to the LSP POM due to the mill being Identity Preserved. So, all of the records were only for LSP own Estate and kept in the mill files.</p>
	2.3.2 For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.	Yes	Not applicable, as currently in LSP POM there is no practice of indirectly source of FFB.

## RSPO PUBLIC SUMMARY

### **Principle 3: Optimise productivity, efficiency, positive impacts and resilience**

Implement plans, procedures and systems for continuous improvement.

Clause	Indicators	Comply Yes/No	Findings
3.1 There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.	3.1.1 (C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.	Yes	<p>The Lam Soon CU has a business plan prepared annually in the form of year budget and the projection for 5 years (2022 until 2026) prepared as a guidance towards sustainable business for future planning.</p> <p><u>For Estate</u></p> <p>The components of the business plan are presented in a budget format comprising of the following.</p> <ul style="list-style-type: none"> <li>a) Crop yielding area.</li> <li>b) Yield statement oil palm</li> <li>c) Total upkeep &amp; cultivation</li> <li>d) Labour statement/Allocation of wages/Labour benefit summary</li> <li>e) Summary of vehicle and running schedule/Job allocation for vehicles</li> <li>f) Summary of workshop running schedule</li> <li>g) Summary of general charges</li> <li>h) Summary cost/ha &amp; cost/mt FFB</li> <li>i) CAPEX</li> <li>j) etc</li> </ul> <p><u>For POM</u></p> <p>The components of business plan as per below:</p> <ul style="list-style-type: none"> <li>a) OER</li> <li>b) KER</li> <li>c) Mill process expenses</li> <li>d) General charges</li> <li>e) General overhead</li> <li>f) Mill repair / maintenance</li> <li>g) Forecast CPO</li> <li>h) Forecast PK</li> <li>i) etc</li> </ul>
	3.1.2 An annual replanting programme projected for a minimum of five years with yearly review, is available.	Yes	The long-range replanting program (LRRP) until 2026 were sighted for both division Estates of the Lam Soon CU. This program was reviewed once a year and was incorporated in their annual financial budget.
	3.1.3 The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.	Yes	Sighted latest Management review meeting has been conducted on dated in Nov 2022 (combine RSPO, RSPO SCCS and MSPO) for both estate and mill. It was attended by Plantations Director, Sr Manager LSPOM, Estate Manager KK (also Chairman of Sustainability) and KL. Relevant issues were discussed.

## RSPO PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
3.2 The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.	3.2.1 (C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.	Yes	The organization had established Continuous Improvement Programme with update on yearly basis. The type of improvement for operating unit as per below: LSPOM 1.Contruction of methane capturing plant (Biogas Plant) with Biogas Engine. 2.To fix steel plate retainer at boiler No 1 Ash bunker to prevent pollution. 3.To build cottage at workers quarters 4.To construct new mill canteen LSE 1.To construct new building for labour quarters 2.To replace heavy machineries such as Diesel truck, tractor and prime mover.
	3.2.2 As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template.	Yes	The RSPO metrics template was submitted to auditors and was verified accordingly and accurately reported.
3.3 Operating procedures are appropriately documented, consistently implemented and monitored.	3.3.1 (C) Standard Operating Procedures (SOPs) for the unit of certification are in place.	Yes	Relevant SOPs in place covering the mill and estate operations, including employment procedures for local and foreign.
	3.3.2 A mechanism to check consistent implementation of procedures is in place.	No	Lam Soon CU continued to implement the mechanism to ensure consistent implementation of operation as per SOPs, such as RSPO internal audit, safety and health meeting and routine inspection (workplace inspection) by assistant manager, staff and hospital assistant. However, it has been noted that the existing procedure implementation i.e., the spraying SOP LSPSB/LDU/SAFETY/SOP-05 missed addressing control measures for heat stress during the work. This has been raised as <i>minor NCR RMN 01-2023</i> .
	3.3.3 Records of monitoring and any actions taken are maintained and available.	Yes	Records of monitoring and the actions taken by the Lam Soon CU continued to be maintained. This is to ensure that the established procedures were consistently implemented. Among the monitoring records sighted were: •Harvesting Interval record. Interval observed varies around 10 to 19 days. •FFB quality is monitored through infield FFB grading conducted by the management on daily basis. •Progress report of application of fertilizers. The work progress was generally on schedule. •Work Program Sheets, Field cost books, Bin cards, Monthly Progress Report, and rainfall data.
3.4 A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a	3.4.1 (C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/outgrower scheme, is documented.	Yes	The organization (LSPOM) had established and updated Environmental Impact Assessment & Pollution prevention plans (EIA) for year 2023. Among the process (station) been identified were FFB receiving, Sterilizer, Threshing, pressing, oil room, Nut plant, steam generation plant, Electricity generation plant, effluent treatment plant, scheduled waste store, workshop, and lab. Latest update for EIA was updated in Jan 2023 by Assistant Engineer. Sighted there is no changes to mill operation except for construction new Biogas Plant and been addressed inside EIA. The organization (LSE) had established and updated Environmental Impact Assessment * Management Actions Plan (EIA) with validity until December 2025. Among the process (station) been identified Replanting, Nursery,



## RSPO PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.			Security guard, transportation, road maintenance, fertilizer store, harvesting, spraying, rat baiting, genset, workshop and etc. Sighted there is no changes to estate operation and been addressed inside EIA. There is no new plantings or operations within LSP CU. The mill and estate's operation continue to exhibit consistent impacts towards their environment and social aspects. Nonetheless, LSP CU has undertaken comprehensive evaluation of their social impacts through Social Impact Assessment (SIA). The SIA included Management Action Plans and Continuous Improvement Plans for Lam Soon Plantations for period of January 2022 – December 2027. This document was prepared in January 2022 by the Sustainability Officer. LSP CU too continued to cater environmental issues via High Conservation Value (HCV) Plan and Monitoring as sighted in a report entitled "High Conservation Value (HCV)/Biodiversity Assessment of the estates Lam Soon Plantations".
	3.4.2 For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.	Yes	The organization had developed mitigation measures to address the negative impact from EIA assessment. Among the mitigating measures been developed were Maintenance of oil trap, Monitor the machineries closely during operation, supplied oil tray and carried out maintenance, training programmes and implementing good practices, while for LSE among the mitigating measure been implemented were improve the biological control on pest management, training on management of waste, continuous monitoring programmes on oil trap and heavy vehicles, monitor the result of soil sampling by agronomist to make sure dosage of fertilizer compactible with soil nutrients needed. An established document named Social Impact Assessment (SIA) Management Action Plans and Continuous Improvement Plans for Lam Soon Plantations January 2022 – December 2027 is available. There is evidence that the establishment of SIA was undertaken through participatory of affected stakeholders. Overview of the SIA document, included among others are demographic data, methodology, relevant stakeholders, flowchart of grievance procedure, list of information that publicly available, details of complaint and grievances procedure continuous improvement plan, sexual harassment reporting procedure etc. Participation of external stakeholders mainly through external stakeholders' consultation latest dated in May 2023 which normally held annually to collect feedback. Meanwhile, participation of internal stakeholders can be through various channels such as JCC meeting, Gender Committee meeting or input from complaint made by the workers. A monitoring plan that includes an action plan for avoiding or mitigating negative impacts and promoting positive ones, as well as monitoring of identified impacts with consultations from relevant stakeholders are available.
	3.4.3 (C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.	Yes	For Mill, monitoring programs as per legal requirement monitoring has been verified as per indicator 2.1.1, the organization also established additional monitoring initiatives. Sighted monthly oil trap inspection checklist, Daily CEMS recorded and, Jadual Pelepasan Asap Hitam for chimneys. For estate, monitoring programmes been established and verified. Among the sample records sighted were 'Record Pembersihan & Pemeriksaan Penapisan Minyak' and the monitoring programmes for the vehicles. LSP CU has updated the Management Plan on Social Impact Assessment in June 2023. Evidence is available that the reviews were done in a participatory way as evidenced from minutes of discussions, written feedbacks, and responses from both internal and external stakeholders. Sighted in the plan some key findings / areas of concern which extracted from meeting minutes such as issue brought during Employee Committee Representatives (ECR) Meeting and Joint Consultative Committee (JCC) Meeting related to broken manhole cover and culvert near Block C at linesite. Sighted the action plan to be taken and to repair the said manhole in stages. Other complaint made was related to inconsistent rubbish collection at linesite by appointed contractor.

## RSPO PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
3.5 A system for managing human resources is in place.	3.5.1 Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.	Yes	Employment procedures for recruitment, selection, hiring, are documented. LSP CU pledge to Labour Policy signed by the Plantation Director. For locals, the procedures are in SOP on Hiring of Local workers. The procedure details out the process of hiring (application form, screening, interview, requisition approval from HR Manager, medical check-up and issuance of letter of offer). This procedure was confirmed by a recruited worker at the LSP Estate verified through the worker's personal file and interview. There are no newly recruited local workers at LSP POM at the time of audit. For foreign worker, the employment procedures are contained in Standard Operating Process & Procedures (SOPP). At the time of audit there are 6 newly recruited foreign workers at LSP Estate. Among the provisions of the policy include ensuring voluntary recruitment, that workers are entitled to terminate their employment without any penalty, equal treatment and payment of equal wages, benefits including accommodation and no discrimination. The policy also commits to not substitute original agreement with other contract, and that newly recruited migrant workers are given training to help familiarise with local culture, safety, labour laws, etc.
	3.5.2 Employment procedures are implemented, and records are maintained.	Yes	There is evidence that the employment procedures for local and foreign workers enumerated are being implemented, and employment records are maintained. Audit team has verified all new recruitment workers from Indonesia through personal file by employee ID, name of employee, employment contract, copy of passport, work permit etc. Meanwhile, all local applications are preceded with a job application form, relevant qualifications and certificates, job interview, records of medical check-up, and the issuance of letter of job offer.
3.6 An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.	3.6.1 (C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.	Yes	Lam Soon CU had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) records, as well as CHRA reports were verified during the assessment. On overall performance, OSH administrative controls implementation as well as engineering control equipment was found adequate during the assessment.
	3.6.2 (C) The effectiveness of the H&S plan to address health and safety risks to people are monitored.	Yes	The monitoring of the health and safety plan is in place.
3.7 All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.	3.7.1 (C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and outgrowers, taking into account gender-specific needs, and which covers applicable aspects of the RSPO P&C, in a form they understand, and which includes assessments of training.	Yes	Formal training programmed for 2023 that covered aspects of the RSPO Principles and Criteria, with regular assessments of training needs were available for all the audited sites. Training Plan was for each operating unit were established. A training need has been established with target dates for the training identified.
	3.7.2 Records of training are maintained, where appropriate, on an individual basis.	Yes	Training records were available and reviewed during the conduct of audit.

## RSPO PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
	3.7.3 Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.	Yes	Appropriate training for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS) has been conducted in May 2023 attended by PICs, Clerk, Assistant Engineer, Staff, Weighbridge Operator, FFB grader, and laboratory staff. There is also training in June 2023 for all workers related to SOP Supply Chain and Complaints.

### SUPPLY CHAIN REQUIREMENTS FOR MILLS

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.1	Identity Preserved Module A mill is deemed to be IP is the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO P&C, or against a Group Certification Scheme Certification for the CPO mills is necessary to verify the volumes and sourced of certified FFB entering the mill, the implementation of any processing control as and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, the inly MB Module is applicable.	Yes	Lam Soon POM received only certified FFB from Lam Soon Estate. Thus, Lam Soon POM has qualified for the Identity Preserved supply chain system and module. During the P&C assessment, the audit team verified the volumes and sources of certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products. Refer to Table 3 of this report for relevant production data.
3.8.2	Mass balance Module A mill is deemed to be MB is the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3 <sup>rd</sup> party certified supply base.	Yes	Not Applicable since Lam Soon POM is IP Mill.
3.8.3	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be	Yes	Available, as in Table 4 of this report.

## RSPO PUBLIC SUMMARY

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	recorded by the CB in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.		
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organisation (RSPO IT platform).	Yes	<p>The mill observed to have met registration and reporting requirements for supply chain through the RSPO Palm Trace. The registration information were:  Name: LAM SOON PLANTATIONS SDN.BHD  Country: Malaysia.  Member Category: Oil Mil  Core product: Palm Oil</p> <p>Copy of Shipping Announcement was provided during the audit as evident of compliance to reporting requirement as listed by the standard.</p>

## RSPO PUBLIC SUMMARY

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.5	<p>The site shall have written procedures and/or work instructions to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> <li>• Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</li> <li>• Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</li> <li>• Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organisation's procedures for the implementation of this standard.</li> <li>• The site shall have documented procedures for receiving and processing certified and non-certified FFBs.</li> </ul>	Yes	<p>LSPOM demonstrated the correct use of supply chain model; They continue to apply the IP model and their suppliers are of own supply base namely Lam Soon Estate. They decided to maintain the IP model for their supply chain system. Therefore, they are being audited against the general chain of custody requirement for the supply chain as well as Module D of the RSPO Supply Chain Standard. The procedure was kept in file RSPO Supply Chain. Appropriate changes were also made in the change. LSPOM has established procedure title: SOP on RSPO Supply Chain describing the procedures on the following activities related on its supply chain certification standard required by the RSPO. It was found that the documented procedures related to implementation of requirements of RSPO Supply Chain Certification Standard (latest revision) were sufficient. LSPOM only applies to the RSPO Supply Chain system within their organization. Therefore, records as such purchasing &amp; sales (FFB delivery note, WB advice ticket, FFB grading, Daily FFB received, Delivery notes), production log (CPO &amp; PK production, Daily production report), training, control of non- conformance, complaint etc. were noted to be updated accordingly.</p>

## RSPO PUBLIC SUMMARY

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.6	<p>The site shall have a written procedure to conduct annual internal audit to determine whether the organisation;</p> <ul style="list-style-type: none"> <li>Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</li> <li>Effectively implements and maintains the standard requirements within its organisation.</li> <li>Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non- conformities shall be subject to management review at least annually. The organisation shall be able to maintain the internal audit records and reports.</li> </ul>	Yes	<p>The Internal Audit Procedure has been developed namely Sustainability Internal Audit Procedure. Internal Audit has been conducted on 25-28/10/2022 by Internal Auditor. No finding has been raised for SCCS during Internal Audit. Audit Attendance sheet, audit plan, audit notes, was sighted by auditor. The audit was conducted against the RSPO Supply Chain Certification Standard Revision 2021 requirements.</p> <p>The documented procedure has defined management review will be conducted once a year, Management review meeting has been conducted (combine RSPO, RSPO SCCS and MSPO). No latest Management review meeting has been conducted by the management.</p> <ul style="list-style-type: none"> <li>•Internal audit – Zero NCR (SCCS only)</li> <li>•Customer feedback – data analysis show result from customer survey (i.e. RSPO-CSPO related to meeting the contract volume, timely delivery, dispatch documentation) result achieved.</li> <li>•Previous meeting – was highlighted</li> <li>•Changes – There are no significant changes accept transfer of Assistant Manager.</li> <li>•Recommendation for improvement – improve the established system</li> </ul>
3.8.7	<p>The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.</p>	Yes	<p>Lam Soon POM received certified FFB from own Estate Which is Lam Soon estate. Approved Sustainable Supplier List (ASSL) for LSPOM</p> <p>Noted that the mill had forward an extension has been made in May 2023 for additional 5,520mt of CPO and 1,020mt of PK.</p> <p>LSPOM had continued to implement the procedures it had on receiving and processing of RSPO certified and non- certified FFBs. (Refer para. Production and Storage – Plant &amp; Storage Tanks (Critical Control Point)) it has described how LSPOM manages the FFB from certified source.</p>

## RSPO PUBLIC SUMMARY

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.8	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single-documents or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documentation and specification documentation):</p> <ul style="list-style-type: none"> <li>a) The name and address of buyer;</li> <li>b) The name and address of the seller</li> <li>c) The leading or shipment/delivery date;</li> <li>d) The date on which the documents were issued;</li> <li>e) RSPO certificate number;</li> <li>f) A description of the product, including the applicable supply chain model (IP or MB or the approved abbreviations);</li> <li>g) The quantity of the products delivered;</li> <li>h) Any related transport documentation</li> <li>i) A unique identification number</li> </ul>	Yes	<p>Documented procedures related to sales and goods out were sighted and found adequate as per shipping announcement. The requirement of sales &amp; goods out especially on notation of applicable Supply Chain model &amp; Certificate number being complied by indicating in weighbridge dispatch ticket. Details of weighbridge ticket, CPO dispatch note, Dispatch oil quality ticket, Authorization from transporter, Borang MPOB L3, CPO dispatch authorization has been verified by the auditor.</p>

## RSPO PUBLIC SUMMARY

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.9	<p>Outsourcing Activities</p> <p>(i) The mill shall not outsource its milling activities. In cases where the mill outsourced activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO SC Certification.</p> <p>(ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that CB has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to the respective operations, systems, and all information, when this is announced in advance.</p>	Yes	<p>LSPOM has outsourced the transportation of certified CPO and certified, and the agreement covering the outsources activity were sighted. Training for contractor was dine in Mar 2023 for transporter contractor owner (during sign the agreement and briefing) and training for transporter driver carried out in Nov 2022 and April 2023. As it has been noted that the meeting highlighted the information on the implementation of RSPO standard. Inspection was carried out as an additional effort to ensure no contamination sighted i.e. "Security Checklist".</p> <p>The RSPO Supply Chain procedure has described outsource activity in Sales &amp; Despatch of products to the Buyer. Inspection was carried out as an additional effort to ensure no contamination sighted book at AP Post. There is also agreement term in 5.12 in the agreement stated that: The transporter Shall provide relevant access for duly accredited CBs to the respective operations, systems, and all information, when this is announced in advance.</p>



## RSPO PUBLIC SUMMARY

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
3.8.10	The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.	Yes	List of contact person for both transporters were made available and up-to-date in the stakeholder list.
3.8.11	The mill shall inform its CB in advance prior to conducting its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	Yes	No new contractors were used and will be used in the future for the processing or production of RSPO certified materials.
3.8.12	The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.	Yes	Sighted CPO and PK delivery note, weighbridge ticket, production data, internal audit and management review records were found up-to-date.
	Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.	Yes	Relevant record was maintained for more than 10 years as per Standard operating procedure for Supply Chain.
	iii ) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.	Yes	Lam Soon POM has maintained the continuous accounting system to record RSPO certified FFB and deliveries of RSPO certified CPO and PK. The data was the summary from their daily template as mentioned above.
	iv) For Mass Balance Module, the mill: a. shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis. b. All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to	Yes	Not Applicable since this mill is IP Mill

## RSPO PUBLIC SUMMARY

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings				
	conversion ratios stated by RSPO. c. The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock).						
3.8.13	Extraction rate The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.	Yes	Lam Soon POM process all the received certified crop & their processing output will be based on their actual Oil Extraction Rate (OER) as well as Kernel Extraction Rate (KER). <table><tr><th>Items/ Month</th><th>Month (Actual) (%)</th></tr><tr><td>Average to date 2023</td><td>OER 23.25 KER 4.13</td></tr></table> <p>These figures were monitored on daily &amp; monthly basis by the mill using the prepared template to ensure their accuracy as well as monitoring of their ongoing performance.</p>	Items/ Month	Month (Actual) (%)	Average to date 2023	OER 23.25 KER 4.13
Items/ Month	Month (Actual) (%)						
Average to date 2023	OER 23.25 KER 4.13						
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	Yes					
3.8.15	Processing For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.	Yes	Sales activities usually handled by Lam Soon Marketing Department (HQ) on behalf of Lam Soon POM.  The dispatch of the RSPO certified CPO/ PK to buyer by Lam Soon POM were made based on a specific contract.  The receiving pit, pipelines and tanks in Lam Soon POM were thoroughly cleaned, swept and flushed before RSPO certified CPO was pumped in to avoid contamination. Dedicated tanks were used to store RSPO certified CPO produced.				
3.8.16	Registration of Transactions i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not	Yes	Details of transaction as per shipping announcement were reviewed during the conduct of audit. It was noted that no record of removal was reviewed during the conduct of the audit. The client removed their stock at the end of license period.				

## RSPO PUBLIC SUMMARY

Ref. in RSPO SCCS	Indicators	Comply Yes/No	Findings
	<p>more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform</p>		
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	Yes	Relevant information on product claim (including applicable Supply Chain model and certificate number) being correctly indicated in the relevant outgoing paperwork. LSPOM has not use RSPO corporate logo as well as trademark logo.

### **Principle 4: Respect community and human rights and deliver benefits**

Respect community rights, provide equal opportunities, maximise benefits from engagement and ensure remediation where needed.

Clause	Indicators	Comply Yes/No	Findings
4.1 The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.	4.1.1 (C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders, is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.	Yes	A policy to respect human rights are documented in the Lam Soon Human Right Policy includes clause prohibiting retaliation against Human Rights Defenders. The policy endorsed by Plantation Director and made available at LSP website at <a href="http://lamsoonplantations.com.my">http://lamsoonplantations.com.my</a> . This policy states among others, that it will develop its businesses with a sense of humanity, ensuring that they are socially beneficial and do not infringe on basic human rights. This Policy is exhibited on notice boards (muster ground, AP post, main office) throughout LSP CU and explain verbally during Internal Stakeholder Meeting. External stakeholders were made aware of the policy during External Stakeholder Consultation in May 2023.
	4.1.2 The unit of certification does not instigate violence or use any form of harassment in their operations.	Yes	Following interviews conducted with various stakeholders, including local communities, neighbouring estates, contractors, and suppliers, no evidence has emerged to suggest that LSP CU engage in violence or employ any form

## RSPO PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
			of harassment within their operations.
4.2 There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.	4.2.1 (C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.	Yes	A documented mutually agreed system for dealing with complaints and grievances is available at the LSP CU. This system is open to all employees and stakeholders as provided in the 'Consultation and Grievances communication Procedure Internal/External', 'Stakeholder Request', Grievances Procedure for Landowner Issue, 'Land Dispute Compensation and Calculation' and 'Sexual Harassment/Violence'. The documented system also comes in the form of complaints form/book where complainant can fill up and submit to the office. A review of the records revealed that all the filled forms submitted by their staffs and workers were requests for house repairs. Most of the complaints were resolved within 2 to 7 days, adherence to the prescribed timeframe in the 'Grievance flowchart', depending on the complexity of the complaints. In some cases, delays were noted due to non-availability of spare parts or repair material. All the complaints forms sighted contain sections for complainants to fill up their names, job and address. This system is also open to whistle blowers where they would be ensured anonymity, and their identity would not be revealed.
	4.2.2 Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.	Yes	A comprehensive procedure has been implemented to ensure that affected parties fully comprehend the grievance procedures. LSP CU have created a complaints form / books where complainant can fill up and submit to the office. Most of the complaints were resolved within 2 to 7 days, depending on the complexity of the complaints. Sighted the complaint logbooks at both LSP POM and LSP Estates contain mainly regarding housing defects and issues were solved accordingly. LSP CU maintained affirms that its dispute system is open to any affected parties including whistle-blower. So far, there was no evidence of disputes at the audited sites. It can be concluded that the system that is open to all affected parties was in place and shall be able to resolve disputes, if any.
	4.2.3 The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.	Yes	There is evidence that LSP CU keeps parties to a grievance informed of progress. Verified at LSP POM, a complaint made related to house defects by workers in June 2023. The complaint was approved and repaired promptly within 3 days. This status progress was updated and acknowledged by the complainant by appending his signature in the complaint form as well as pictorial evidence for reference. The same was implemented at LSP Estate where complaints related to broken culvert were raised during JCC Meeting. Although the complaint cannot be resolved promptly, sighted appropriate action plan and timeframe is available and the complainant was kept informed of the progress via JCC Meeting.
	4.2.4 The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.	Yes	The conflict resolution mechanism does have an option for aggrieved parties to have the option for representatives of their choice. It stated in Consultation and Grievances communication Procedure Internal/External' dated May 2020 under Clause External Stakeholder. SOP named Consultation and Grievances Communication Procedure Internal/External' which was prepared by the RSPO Unit of Lam Soon. The CU has continued to use the internal communication through morning assemblies, notice boards and posters, and complaint forms/book. These documents were all documented and sighted. There was also another set of Books/forms entitled 'Buku Aduan (Complaint Book)' which contain complaints and suggestions from external stakeholders and submitted to the estate during a stakeholder meeting or at any time during office hour. Flowchart for complaints to management from external and internal stakeholders also available in Grievance's process and Grievance procedure.

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Clause	Indicators	Comply Yes/No	Findings
4.3 The unit of certification contributes to local sustainable development as agreed by local communities.	4.3.1 Contributions to community development that are based on the results of consultation with local communities are demonstrated.	Yes	The LSP estate and the mill provide contributions to the local communities. LSP POM and LSP Estate have employed local communities from surrounding estate, Sandakan and Lahad Datu. The contributions to local development were based on consideration of the main social issues.
4.4 Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.	4.4.1 (C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents related to the history of land tenure and/or the actual legal or customary use of the land are available.	Yes	Review of the document provided, found that the land titles were previously owned by Pacific Cocoa Plantations Sdn Bhd. The Pacific Cocoa bought land from the government of Sabah in April 1986. The Company has changed her name into Lam Soon Plantations Sdn Bhd in July 2000. The Land title is Country Lease and also specified that the purpose of the planting is either for oil palm or agricultural crops for economic value. It can be confirmed that Lam Soon Plantations maintained and complied with the terms of the land title. The location of POM was located in the estate land title.
	4.4.2 Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	Yes	As reported in 4.4.1 of this checklist, it has been verified that the land is now legitimately owned by LSP CU since 1986. The audit team had confirmed that there were no land issues related to previous owners.
	4.4.2a Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making.	Yes	
	4.4.2b Evidence that the unit of certification has respected communities' decisions to give or	Yes	

## RSPO PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
	withhold their consent to the operation at the time that these decisions were taken.		
	4.4.2c Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.	Yes	
	4.4.3 (C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighboring communities where applicable, and relevant authorities).	Yes	Based on document provided, found that the land titles were previously owned by Pacific Cocoa Plantations Sdn Bhd. Pacific Cocoa bought land from the government of Sabah in April 1986. The Company changed its named into Lam Soon Plantations Sdn Bhd in July 2000. The Land title is Country Lease and also specified that the purpose of the planting is either for oil palm or agricultural crops for economic value. It can be confirmed that Lam Soon Plantations maintained and complied with the terms of the land title. The location of POM was located in the estate land title. It has been verified that the land has now legitimately owned by LSP CU since 1986. All the related documentation regarding the land acquisition was kept in Lam Soon HQ Office, Glenmarie, Shah Alam and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community, neighboring estates and external stakeholders.
	4.4.4 All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.	Yes	
	4.4.5 (C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.	Yes	
	4.4.6 There is evidence that implementation of agreements negotiated through FPIC is annually	Yes	There is no implementation of agreements negotiated through FPIC. Thus, this indicator was not applicable.

## RSPO PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
	reviewed in consultation with affected parties.		
4.5 No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.	4.5.1 (C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.	Yes	Based on Social Impact Assessment (SIA) Report for LSP CU and land title, there was no new plantings are established on local peoples' land. It has been verified that the land has now been legitimately owned by LSP CU since 1986. The audit team had confirmed that there were no land issues related to previous owners.
	4.5.2 (C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.	Yes	There is no implementation of agreements negotiated through FPIC. Thus, this indicator was not applicable.
	4.5.3 Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.	Yes	There is no implementation of agreements negotiated through FPIC. Thus, this indicator was not Applicable.

## RSPO PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
	4.5.4 To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.	Yes	There is no implementation of agreements negotiated through FPIC, and no land allocation process. Thus, this indicator was not applicable.
	4.5.5 Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.	Yes	
	4.5.6 Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.	Yes	
	4.5.7 New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations.	Yes	No new lands are acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later). Thus, this indicator was not Applicable.
4.6 Any negotiations concerning compensation for loss of legal,	4.6.1 (C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.	Yes	The LSP CU has a standard procedure for identifying procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation issues known as "Land Dispute Compensation and Calculation Procedure" and "Procedure For Calculating & Distribution Fair Compensation". The procedures state out the detailed process of compensation for issues/disputes related to land, ownership and access to land. It also states how compensation are to be dealt with. However, as of the date of the audit, no evidence is available at either the Estate or Mill of any dispute related to on customary rights, boundary disputes, etc.



## RSPO PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
customary or user rights are dealt with thru a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
	4.6.2 (C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.	Yes	In accordance with the 'Land Dispute Compensation and Calculation Procedure" and "Procedure for Calculating & Distribution Fair Compensation is established. However, there was no issue/case related to this indicator as verified by audit team during consultation with staff and workers at mill and visited estates.
	4.6.3 Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings.	Yes	There were no scheme small holdings at Lam Soon Plantations Sdn Bhd CU. The Fresh Fruit Bunches are supplied from Lam Soon owned estates which are certified to RSPO.
	4.6.4 The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.	Yes	There was no process and outcomes of any negotiated agreements, compensation and payments to any affected parties.
4.7 For new planting, where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.	4.7.1 (C) A mutually agreed procedure for identifying people entitled to compensation is in place.	Yes	The procedure for identifying legal, customary or user rights, and compensation process is incorporated in the Land Dispute Compensation and Calculation Procedure" and "Procedure For Calculating & Distribution Fair Compensation", the procedure for calculating and distributing fair compensation falls within the purview of the Land Management Department of at the LS Head Office. The procedure stipulates the involvement of the respective estate management, Land Office, NGOs and the affected parties in the negotiation procedures.
	4.7.2 (C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.	Yes	There was no issue regarding compensation (monetary or otherwise) with villagers, local communities, neighbouring estate and external stakeholders.
	4.7.3 Communities that have lost access and rights to land for plantation expansion are given	Yes	As reported in 4.4.1 of this checklist, It has been verified that the land is now legitimately owned by LSP CU since 1986. All the related documentation regarding the land acquisition was kept in Lam Soon HQ Office, Glenmarie, Shah Alam and the copy in the estate was verified by the auditor. There were no issues regarding land expansion with

## RSPO PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
	opportunities to benefit from plantation development.		villagers, local community and neighbouring estate
4.8 The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.	4.8.1 Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.	Yes	As reported in 4.4.1 of this checklist, It has been verified that the land is now legitimately owned by LSP CU since 1986. All the related documentation regarding the land acquisition was kept in Lam Soon HQ Office, Glenmarie, Shah Alam and the copy in the estate was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate.
	4.8.2 (C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.	Yes	Land conflict is not present in the area of the unit of certification.
	4.8.3 Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant reqs. (Indicators 4.4.2, 4.4.3 and 4.4.4).	Yes	There was no evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations.
	4.8.4 For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory	Yes	There was no conflict or dispute over the land. It has been further confirmed through interviewed relevant stakeholders.

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Clause	Indicators	Comply Yes/No	Findings
	way with involvement of affected parties (including neighboring communities where applicable).		

### **Principle 5: Support smallholder inclusion**

Include smallholders in RSPO supply chains and improve their livelihoods through fair and transparent partnerships.

Clause	Indicators	Comply Yes/No	Findings
5.1 The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.	5.1.1 Current and previous period prices paid for FFB are publicly available and accessible by smallholders.	Yes	Fresh Fruit Bunches were supplied from Lam Soon Plantations owned estates (LS Estate) which are certified to RSPO. There were no third-party FFBs sent to the mill. Thus, no contract involved with smallholder. Currently the records of current and previous period prices paid for FFB are not available since this mill is IP mill. LSP CU is surrounded by neighboring estates. The nearest smallholder is located further than 10 km from LSPSB. No smallholders are located neighboring the CU directly.
	5.1.2 (C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.	Yes	Fresh Fruit Bunches were supplied from Lam Soon Plantations owned estates (Lam Soon Estate) which are certified to RSPO. There were no third-party FFBs sent to the mill. Thus, no contract involved with smallholders and not regularly briefing to smallholders.
	5.1.3 (C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	Yes	Fresh Fruit Bunches were supplied from Lam Soon Plantations owned estates (Lam Soon Estate) which are certified to RSPO. There were no third-party FFBs sent to the mill. Thus the indicator was Not applicable.
	5.1.4 (C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.	Yes	Fresh Fruit Bunches were supplied from Lam Soon Plantations owned estates (Lam Soon Estate) which are certified to RSPO. There were no third-party FFBs sent to the mill. Thus the indicator was Not applicable.
	5.1.5 Contracts are fair, legal and transparent and have an agreed	Yes	Interviews conducted with contractors and suppliers at estate, FFB Transporter, Grass cutting, Garbage transporter had confirmed their understanding of their rights and obligations under the contract. Both contractors

## RSPO PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
	timeframe.		confirmed the fairness of the terms of their contract, and payments are usually received within 7 to 10 days of invoice issuance.
	5.1.6 (C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.	Yes	These contractors interviewed confirmed that payments are made in a timely manner, namely within 7 to 10 days of invoice.
	5.1.7 Weighing equipment is verified by an independent third party on a regular basis (this can be government).	Yes	Weighing Equipment in LSP POM has been calibrated by yearly basis using accredited weighing company Metrology Corporation Malaysia Sdn Bhd.
	5.1.8 The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material.	Yes	LSP CU supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. However, in LSP CU, Fresh Fruit Bunches are supplied from Lam Soon owned estates (LS Estate) which are certified to RSPO. There is no third-party FFB sent to the mill. LSP CU had a meeting in May 2023 with smallholders based on the minutes of the meeting, RSPO certification was promoted. However, so far, all smallholders preferred to certify under MSPO scheme as this is Government requirement.
	5.1.9 (C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.	Yes	The CU also has developed a Standard Operating Procedure (SOP) on Stakeholder Consultation. It contains procedures for consultation and discussions, solving issues/grievances, records and improvements, which is the responsibility of the Manager and Assistant Manager. It also stipulates those issues and grievances can be raised via comments, complaints, or request for information, and that all issues are to be resolved fairly and within the stipulated timeframe. The SOP also states that Master List of Documents must be available for stakeholders' reference. This SOP are being exhibited at the office notice boards at muster grounds.
5.2 The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.	5.2.1 The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification.	Yes	LSP CU supports Independent Smallholders to improve smallholder livelihood and build their capacity to enhance productivity, quality, organizational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder). LSP CU has invited nearby smallholders to attend the Stakeholder meeting in May 2023 to promote RSPO certification. Sighted minutes of the meeting included RSPO certification and training related to chemical usage and handling to them was given. So far, all smallholders prefer to be certified under the MSPO scheme as this is a government requirement.
	5.2.2 The unit of certification develops and implements smallholder support program to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO	Yes	LSP CU has invited nearby smallholders to attend the Stakeholder meeting in May 2023 to promote RSPO certification. Sighted minutes of the meeting included RSPO certification and training related to smallholder livelihood and building their capacity to enhance productivity, good agriculture practices, chemical usage and handling to them was given.

## RSPO PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
	Standard for Independent Smallholder).		
	5.2.3 Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	Yes	LSP CU has invited nearby smallholders to attend the Stakeholder meeting in May 2023 to promote legality of FFB.
	5.2.4 (C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	Yes	LSP CU has invited nearby smallholders to attend the Stakeholder meeting in May 2023 to promote RSPO certification. Sighted minutes of the meeting included RSPO certification and training related to good agriculture practices, chemical usage and handling to them was given. So far, all Grower/smallholders had preferred to certify under MSPO scheme as this is a government requirement, and also there is no smallholder surrounding Lam Soon Plantations, only Grower available surrounding Lam Soon Plantations.
	5.2.5 The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	Yes	LSP CU has regularly reviews and reports the progress of the smallholder support program, including the stakeholder meeting to keep the stakeholder informed.

### **Principle 6: Respect workers' rights and conditions**

Protect workers' rights and ensure safe and decent working conditions.

Clause	Indicators	Comply Yes/No	Findings
6.1 Any form of discrimination is prohibited.	6.1.1 (C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.	Yes	The CU pledges to Lam Soon Plantations Sustainability Statements serves as a guide to ensure that workers of Lam Soon are recruited and provided an environment which is free from unlawful discrimination, harassment, or victimization and that Lam Soon is implementing the Group's commitment to equal opportunities, freedom of association and collective bargaining at all times. The policy is available and displayed at the main notice boards and can be downloaded from the Lam Soon Plantations website ( <a href="https://lamsoonplantations.com.my">https://lamsoonplantations.com.my</a> ) .
	6.1.2 (C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for migrant workers.	Yes	Evidence is available that no employee has been discriminated against. Review of payslips and employment contracts confirmed that all workers irrespective of nationalities, gender, age, religion, etc, are accorded the same terms of employment, pay, benefits and living standards. Company provides all the related mandated applicable social benefits to all its local and foreign workers, for example Employee Provident Fund (EPF), Social Security Organization (SOCSO), Employment Insurance System (EIS), Annual Leave, Public Holidays & Statutory Holidays, Medical Leave and Maternity Leave. Deduction (where applicable), for example, EPF, SOCSO, EIS, Taxes were made as per Sabah Labour Ordinance. Foreign workers interviewed also confirmed that they pay which covered their Indonesian passport, <i>Kad Tanda Penduduk</i> (Indonesian ID card),

## RSPO PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
			visa, immigration processing fee, Malaysian work permit (PLKS). The balance is paid by the Company which include travel insurance, medical checkup, transportation fee, levy, etc. This breakdown of payment was agreed between the hiring Company and the recruitment agency.
	6.1.3 The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.	Yes	As stipulated in the "Recruitment selection, Hiring and Promotion" for staff and "Recruitment of Workers" for workers, the recruitment selection, hiring and promotion where relevant are based on availability, skills, capabilities, qualities, and medical fitness necessary for the jobs.
	6.1.4 Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.	Yes	Based on documentation review provided by the Health Assistants and confirm by workers at the LSP CU, pregnancy tests were only conducted when the workers presented themselves at the estate's clinic and was not conducted in a discriminatory manner. The pregnancy test was done on her own free will. During the interview, workers were aware should they were found pregnant, they should avoid contact with chemical and alternative equivalent work will be provided for them.
	6.1.5 (C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.	Yes	A Gender Committees has been established at LSP CU where membership comprises of female employees of both mill and estate, and the employees' wives. The organizational chart of the Gender Committee was reviewed, confirming the representation of members from various roles within the mill and estate. Based on interviews of the committee members and review of meeting minutes, the committees serve as platform to provide awareness to its members on issues of concern to female. These relates but not limited to sexual harassment, domestic and other forms of abuse, children's health, immunization and education, as well as women's reproductive rights. Meetings are held every 4 to 6 months and normally twice a year.
	6.1.6 There is evidence of equal pay for the same work scope.	Yes	Based on review of employment contracts and monthly pay slips, LSP CU have demonstrated that workers receive equal pay for the same scope of work regardless of gender and nationality. Worker's remuneration is either daily or piece rate based on Sabah labour Ordinance and the decent living wages (DLW) formulated by the company in the work done. This is in tandem with Equal Opportunities Policy established by the company where it states that all employees shall be treated fairly in terms of recruitment, progression, terms and conditions of work regardless of race, caste, nationality, gender, physique, sexual orientation, union membership, political view, religion and age. Comparisons were made of sampled employment contracts and payslips of female and male workers who works as FFB Checker. Evidence is available that both gender receive equal pay for equal work.
6.2 Pay and conditions for staff and workers and for contract workers always meet at least legal or	6.2.1 (C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they	Yes	LSP CU documentation of pay is in the form of monthly pay slips. Conditions of pay are contained in the workers' respective employment contracts. Samples of the monthly pay slips and employment contracts were made available and reviewed during the audit. The employment contracts issued to all workers (local and foreign) have been prepared in Bahasa Malaysia. Labour laws, union and/or other collective agreements detailing payments and other conditions were made available in the languages understood by the workers and explained to them before signing off the contract, mainly during induction. Included in the employment

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Clause	Indicators	Comply Yes/No	Findings								
industry minimum standards and are sufficient to provide decent living wages (DLW).	understand.		contract such as public holidays, paid annual leave, sick leave, final repatriation costs to be paid by employer, and mutual termination of contract. Each pay slip contains the name of employee, month of pay, income (basic, overtime, reimbursement, allowances), deductions, net salary, number of working days and non-working days, unpaid leave etc. Interviews with workers reveal that they understand the contents of the employment contracts and their detailing payment (payslips) and will seeks explanation from the management should they require further clarifications. It was verified that workers are being paid in accordance with the requirements stipulated under the Minimum Wages Order 2022 and Sabah Labour Ordinance.								
	6.2.2 (C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.	Yes	Employment contracts signed between the LSP CU management and their employees contain employment and payment terms and provisions covering contract duration, place of work, job specifications, working hours and overtime, designated public holidays, workers' annual leave, medical expenses, sick leave, maternity leave, workers' and employee's obligations, payment of foreign workers' levy by employer, payment of passport and PLKS by workers, and allowances, insurance scheme, EPF for local workers, salary deduction, mutual termination of contract, contract extension, etc. There is also evidence that the contracts agreement is prepared in a language understood by workers and explained to them upon signing off the contract agreement. Worker's remuneration is either daily or piece rate based on Sabah Labour Ordinance and the decent living wages (DLW) formulated by the company in the work done. Payslips are issued to the workers every month, before or by 7th. The pay slip contains the following information: employee name, employee ID, IC/passport, month of pay, work description, normal work, overtime pay, piece-rate work, public holiday pay, deductions such as SOCSO, EIS, KSWP, average daily rate, total income for the month, total deductions and their net pay.								
	6.2.3 (C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.	No	<u>LSP POM</u> At the time of audit, 12 workers of both local and foreign were selected. It was noted that the review of workers' payslip, punch card and check-roll logbook for the month of February 2023 revealed that overtime payment was varies due to miscalculation. Details as follows: <table><tr><td>Workers ID</td><td>Hours not paid</td></tr><tr><td>G0015</td><td>3</td></tr><tr><td>G0053</td><td>0.5</td></tr><tr><td>G0072</td><td>2.5</td></tr></table> <u>LSP Estate</u> Menuju Kejayaan was hired as FFB Transporter to evacuate FFB from field to the mill. Employment contracts for each driver were available. However, verified through payslip, it was noted that the driver was not paid twice the ordinary rate per piece for working on rest day which is not in accordance with Sabah Labour Ordinance. A major non-conformance has been raised to 6.2.3 as NEA 01-2023.	Workers ID	Hours not paid	G0015	3	G0053	0.5	G0072	2.5
Workers ID	Hours not paid										
G0015	3										
G0053	0.5										
G0072	2.5										

## RSPO PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings												
	6.2.4 (C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.	Yes	Evidence is available that LSP CU provides adequate housing and facilities in accordance with the requirements of the Workers' Minimum Standard of Housing and Amenities Act 1990. All workers are provided with free accommodation as stated in their employment contracts, and free electricity and water supplies. With the exception mentioned below, the houses are generally in good state of repair. Each house has between 2 to 3 rooms, and each room occupied by 1 or 2 persons. Based on visits conducted, the houses provided were adequate, and in reasonably good condition and comfortable. Interviews with the workers reveal that they were satisfied with the response to requests for any repair works.												
	6.2.5 The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.	Yes	LSP CU have their own canteen/grocery store which sells necessities such as eggs, flour, cooking oil, rice, vegetables, frozen food etc. Site visit made at grocery store at linesite showed that items are adequate, clearly labelled and within the expiry dates. Workers interviewed informed that they purchase items from the store and the price is equivalent to outside. LSP CU has taken initiatives to conduct monitoring and price comparison.												
	<p>6.2.6 A "DLW" is paid to all workers, including those on piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p>PROCEDURAL NOTE: A written policy with specific implementation plan, committing to payment of a "decent living wage" is in place. The implementation plan with specific targets, and a phased implementation process will be in place, including the following:</p> <ul style="list-style-type: none"> <li>An assessment is conducted to determine prevailing wages and in-kind benefits already being provided to workers.</li> </ul>	Yes	<p>Based on pay slips sighted, all sampled workers who complete the number of days offered in a month receive at least minimum wages applicable, which is RM1,500 per month, or more. LSP CU also has carried out the calculation of prevailing wages and in-kind benefits as evidenced from the calculation of prevailing wages. The calculation took into account housing, electricity, water, education, childcare and healthcare. The breakdown of the prevailing wage calculation is therefore as follows:</p> <table border="1"> <thead> <tr> <th>LSPOM</th><th>Prevailing wage</th><th>LS Estate</th><th>Prevailing wage</th></tr> </thead> <tbody> <tr> <td>Local workers</td><td>RM 2,332.29</td><td>Local workers</td><td>RM 3,273.28</td></tr> <tr> <td>Foreign workers</td><td>RM 2,331.70</td><td>Foreign workers</td><td>RM 3,273.28</td></tr> </tbody> </table> <p>Based on the breakdown given, the calculation of prevailing wages including in-kind benefits is in accordance with RSPO Guidance on Calculating Prevailing Wages.</p>	LSPOM	Prevailing wage	LS Estate	Prevailing wage	Local workers	RM 2,332.29	Local workers	RM 3,273.28	Foreign workers	RM 2,331.70	Foreign workers	RM 3,273.28
LSPOM	Prevailing wage	LS Estate	Prevailing wage												
Local workers	RM 2,332.29	Local workers	RM 3,273.28												
Foreign workers	RM 2,331.70	Foreign workers	RM 3,273.28												



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Clause	Indicators	Comply Yes/No	Findings
	<ul style="list-style-type: none"> <li>There is annual progress on the implementation of living wages</li> <li>Where a minimum wage, based on equivalent basket of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment.</li> <li>The unit of certification may choose to implement the “living wage” payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before an eventual scale-up of the living wage implementation</li> </ul> <p>Until such time where the Malaysian version of “decent living wage” has been endorsed by RSPO and implemented by the unit of certification, the Malaysian minimum wage has to be paid.</p>		
	6.2.7 Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.	Yes	All the estates and mill employ full-time employees. Foreign workers which mainly Indonesian are full-time employees but have a contractual duration which is stipulated in their employment contracts which is 2 years for Indonesians. This contract duration can be mutually extended subject to the annual work permit from the Malaysian Immigration Department.
6.3 The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively.	6.3.1 (C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.	Yes	Recognition of freedom of association is available in the Lam Soon Policy states that the company respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. This policy is applicable throughout all operating units and is printed and translated in Bahasa Malaysia. The policy was seen displayed on notice boards in the estate and mill communicated to workers accordingly.
Where the right to freedom of association	6.3.2 Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English	Yes	Although there is no trade union operating within the estate and mill premises, workers are not prohibited from appointing their own group leaders to represent them in the Joint Consultative (JCC) meetings with the management team. The JCC comprises of management representatives and worker’s representatives and is chaired by the Sustainability Officer.

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Clause	Indicators	Comply Yes/No	Findings
and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.	and/or Bahasa Malaysia) and made available upon request.		
	6.3.3 Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.	Yes	Evidence is available that workers' representatives that sit in the Workers' Welfare and Social Committees have been independently and freely elected by the workers themselves and there is no evidence of any management interference.
6.4 Children are not employed or exploited.	6.4.1 A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.	Yes	LSP CU has implemented a Child Protection Policy (Polisi Perlindungan Kanak-Kanak) to ensure that individuals under the age of 16 are not employed within their operations. Thorough review of the workers' masterlist, which includes details such as workers' dates of birth, found that the estate and the mill did not employ anyone below the age of 18. Verified through the contractors in the CU, it is confirmed there was no contractor's workers of below 18 years old were employed.
	6.4.2 (C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.	Yes	It has been verified that LSP CU has strictly adhered to the policy of not employing individuals below the age of 18 years. Review of the workers masterlist found no evidence that the estate and mill employed anyone below the age of 18 years old. This was verified by examining the master lists, personal file, contracts and payslip of each operating unit where details of the workers' IC numbers, passport and dates of birth are available. Furthermore, interviews conducted with workers and staff, as well as observations made during field visits, support the finding that only individuals above the age of 18 are employed at the LSP CU. This confirms the commitment of the organization in tandem to the company policy.
	6.4.3 (C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.	Yes	Based on documentation review such as personal files and employee databases, there were no young persons employed in both Lam Soon POM and Lam Soon Estate. Interviewed with sampled workers also, none of them in such categories.
	6.4.4 The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.	Yes	LSP CU were able to demonstrate and communicate its Child Protection Policy specifying in 'no child labour' during external stakeholder consultation which was held on 23.05.2023. The same were briefed to all levels of employees as evidence from training records and muster briefing at the mill and estates. The policy too was available and displayed prominently at notice boards and can be downloaded from website. Interview conducted among workers and contractors show their understanding on the policy.
6.5 There is no harassment or abuse	6.5.1 (C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all	Yes	LSP CU subscribes to the Workplace Harassment & Violence Policy which defines what constitutes sexual harassment. The Policy also states that the Company would comply with the relevant laws and increase awareness with regards to sexual harassment. The policy is written in Bahasa Melayu and English and

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Clause	Indicators	Comply Yes/No	Findings
in the workplace, and reproductive rights are protected.	levels of the workforce.		displayed on the notice boards. Awareness on sexual, other forms of harassments and violence were also briefed during morning muster, meeting or training at mill and estate. The same were emphasized during Gender Committe meeting. External stakeholders and contractors were also briefed on the policy during external stakeholder consultation. Documentation review revealed that there was no case of harassment and violence has been recorded. It was further confirmed during interview with workers and stakeholders.
	6.5.2 (C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.	Yes	The 'Women Reproductive Rights Policy' states that LSP CU fully respects women reproductive rights, care about mother and children, and provide a safe and healthy environment. Policies were displayed at the estate and mill notice board. Gender Committee has been established to help disseminate awareness on issues related to reproductive rights. The female workers are further enhanced on the matter of harassment and violence during the Gender Committee meeting. Interviews with female workers confirmed that this Policy is being implemented and that they are entitled to paid maternity leave, and there is no prohibition from management on the number of children to have.
	6.5.3 Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.	Yes	At the time of audit, it was noted that assessment of the needs of new mothers has been carried out by Gender Committee in June 2023 to 5 newly delivered mother at both mill and estate. Sighted in the assessment, all workers that currently pregnant was listed and their expected delivery date were jot down for easier reference. Among request made by the mothers were request for nutritious supplement for baby. Sighted action taken by management by including all request in action plan and to continue supply of good milk at creche and vitamin at estates dispensary.
	6.5.4 A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.	Yes	LSP CU has developed a grievance mechanism that serves as a platform for both internal and external to channel their grievances. This was spelt out in a Complaint Policy signed by Plantation Director. Grievance mechanism related to complaints against sexual harassment is available known as 'Sexual Harassment Procedure'. It also contains a 'Sexual Harassment Reporting Flowchart' which explains the process of grievance handling for both external and internal parties. According to the procedures, complainants can submit their complaint either in writing or verbally. Workers interviewed know that they can either complain to their immediate supervisor, Gender Committee or if they wish, to the estate management. Workers too know their rights to be protected and remain anonymous if requested.
6.6 No forms of forced or trafficked labour are used.	6.6.1 (C) All workers have entered into employment voluntarily, and the following are prohibited: <ul style="list-style-type: none"> <li>Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes)</li> <li>Charging the workers for recruitment fees</li> <li>Contract substitution</li> <li>Involuntary overtime</li> </ul>	Yes	Collective evidence is available that all sampled workers have entered into employment voluntarily. This is based on the following: <ol style="list-style-type: none"> <li>review of sampled employment contracts which contain mutually agreed termination clause;</li> <li>observation and interview with foreign workers confirmed that they keep their own passport;</li> <li>review of recruitment agency contract between Lam Soon and Agensi Pekerjaan TKA Sdn Bhd dated 15/1/2019 where no recruitment fee is payable by the workers and confirmed by the workers (except for passport, medical in and biometrics in home country). Whereby for the mill, they used the agency only for renewal work permit and passport.</li> <li>records of punch cards and workers confirmation that overtime work is mutually agreeable and not forced on them;</li> <li>confirmation from the foreign workers that they received accurate briefing in their home country on the job they would be doing in Malaysia;</li> <li>and confirmation from the workers that there is no debt bondage or withholding of wages.</li> </ol>

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Clause	Indicators	Comply Yes/No	Findings
	<ul style="list-style-type: none"> <li>• Lack of freedom of workers to resign</li> <li>• Penalty to the workers for termination of employment</li> <li>• Debt bondage</li> <li>• Withholding of wages</li> </ul>		
	6.6.2 (C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.	Yes	The LSP CU has adopted the Special Labour Policy. Among the provisions of the policy include ensuring voluntary recruitment, that workers are entitled to terminate their employment without any penalty, equal treatment and payment of equal wages, benefits including accommodation and no discrimination. The policy also commits to not substitute original agreement with other contract, and that newly recruited migrant workers are given training to help familiarise with local culture, safety, labour laws, etc.
6.7 The unit of certification ensures that the working environment under its control is safe and without undue risk to health.	6.7.1 (C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.	Yes	<p>Estate(s) and Mill Managers were appointed as responsible person(s) for safety and health issues and also chairman for OSH Committee. The Manager subsequently assigned duties of OSH coordinator to the Assistants or medical assistant for the downline implementation of OSH practices in the estate and mill. The OSH committee organization chart for 2023 was available. The Estate/Mill Manager is the chairman, and the Mill Engineer/Assistant Manager is the secretary. OSH Committee meetings confirmed that among the agenda discussed, included the following:</p> <ul style="list-style-type: none"> <li>▪ Passing of previous minutes</li> <li>▪ arising matters.</li> <li>▪ Proposed agenda</li> <li>▪ Accident report (Monthly Data of Mill/Estate Safety Performance)</li> <li>▪ Workplace inspection available</li> <li>▪ Safety report and programme</li> </ul> <p>OSH Committee meetings were held once in three months. Minutes of the meeting reviewed.</p>
	6.7.2 Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.	Yes	<p>Emergency Response Plan (ERP) was established. Random interviews with the mill workers showed that they were aware of accident and emergency procedures. First Aid boxes were available for work operations in the field in all estates and mills. This has been confirmed by site inspection at weeding operation, manuring operation, harvesting operation, workshop, chemical &amp; fertilizers store for all estates. Furthermore, the first aid kit sighted with completed contents and no medication with expired date. The stock of first aid box is regularly checked and refill, when necessary, by HA.</p> <p>Telephone numbers and names of the members of the Emergency Response Team (ERT) were communicated to all employees and displayed at notice boards. Telephone numbers of the PIC, Police Station, Fire Brigade, and Klinik Kesihatan were also included.</p>
	6.7.3 (C) Workers use appropriate personal protective equipment (PPE), which is	Yes	Training and briefing on the operations were provided for workers to educate them on safe working practices. This is also done to ensure that the applicable precautions are adhered. Training for employees is conducted

## RSPO PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
	provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.		from time to time based on needs through various methods such as on the job training, briefings, meetings, etc. The staff and workers such as the storekeepers, Mill workers, harvesters, pruners, field workers, sprayers, fertilizer and rat bait workers were trained, and they had understood the hazards involved and how the chemicals should be used in a safe manner. During site visit at chemical and premix area stores, sanitation facilities for sprayer and manuring operator were available for workers washing the PPE and clothes. Based on the HIRARC carried out at the estates, the PPE types for the various activities were identified and recommended. Sanitation facilities for those applying pesticides was available near to chemical store area, after completed spraying activities, the workers will change out of PPE, wash and put on their personal clothing at the area. Meanwhile, during site inspection estate and mill workshop, most of the moving part and rotating machinery were installed with machine guarding and properly covered.
	6.7.4 All workers are provided with medical care and covered by accident insurance. Costs incurred from work-related incidents leading to injury or sickness are covered in accordance with Malaysian law.	Yes	Lam Soon CU provides medical care to Estate & POM workers with Estate Clinic established within the premises. Cases requiring higher attention of medical care are referred to Lahad Datu Hospital. All the workers both local and foreign, estate and mill are covered by SOCSO.
	6.7.5 Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	Yes	For Lam Soon CU, the organization had recorded all accidents and submitted via JKPP 8 form to DOSH. Latest submission was in Jan 2023 with zero (0) accident case for estate and one (1) accident case for POM in 2022.

### **Principle 7: Protect, conserve and enhance ecosystems and the environment**

Protect the environment, conserve biodiversity and ensure sustainable management of natural resources.

Clause	Indicators	Comply Yes/No	Findings
7.1 Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.	7.1.1 (C) IPM plans are implemented and monitored to ensure effective pest control.	Yes	In order to reduce the quantity of chemical pesticides entering the environment, the IPM plan 2023 was based on preventive measures, monitoring crop damages, assessing the pest damages and choosing appropriate actions such as: <ul style="list-style-type: none"> <li>Cultural controls – deprive pests' comfortable habitat through legume cover crop (LCC) planting, removal of infected plant materials, sanitation equipment and application of EFB in single layer to prevent RB breeding area.</li> <li>Biological controls- attract a natural predators using a beneficial plant such as <i>Cassia cobanensis</i>, <i>Antigonon leptopus</i> and <i>Turnera subulata</i>.</li> <li>To treat Ganoderma i.e mounding</li> <li>To do census and install pheromone trap at replanting areas.</li> <li>To do bunch census damaged by rat</li> </ul>

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Clause	Indicators	Comply Yes/No	Findings
			<ul style="list-style-type: none"> <li>To do census monthly if any trace of bagworm</li> </ul>
	7.1.2 Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.	Yes	Species referenced in the Global Invasive Species Database and CABI.org. were not used in managed areas of the estates.
	7.1.3 There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities.	Yes	Lam Soon CU continued to use the Lam Soon policy of no open burning. As advocated, estate practised Zero burning thus no use of fire for pest control. In the year 2022 replants visited during the audit in the KL estates division, it was evident that all palms were felled, shredded, windrowed, and left to decompose. For pest and disease attack census has been carried out to monitor the threshold level of attacks before applying the chemicals such as rat baits and pheromone traps.
7.2 Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.	7.2.1 (C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritized.	Yes	Lam Soon Estate only used pesticides that are officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision Pesticides Act 1974 (Act 149) (Section 53A); and in accordance with USECHH Regulations (2000). There was no evidence of pesticides that are categorized as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, had been used. The chemical store and chemical list indicated All 4 estates had none of the chemicals. The use of paraquat was banned in all Lam Soon estate. Most pesticides used were class III & class IV.
	7.2.2 (C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.	Yes	The Estate had records to show the types of pesticides used with active ingredients and their LD50 and where these pesticides had been used, the total quantity, number of applications and Ai/Ha. Pesticides are used only when justified and areas used are recorded in bin cards, program sheets, chemical register, field cost books and in progress reports. LSP estate had documented programs for spraying pesticides and for rat baiting.
	7.2.3 (C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.	Yes	As part of the IPM plans, management of the estate had established nectariferous beneficial plants ( <i>Cassia cobanensis</i> , <i>Antigonon leptopus</i> and <i>Turnera sublata</i> ) nurseries for continuous planting in order to attract natural predators and thus to reduce use of insecticides.
	7.2.4 There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.	Yes	There was no prophylactic spraying has been used. For control bag worm damages. Management has used pheromone trap for control the damages and before applying rat baits management has conducted census (twice per month) before applying it.
	7.2.5 Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional	Yes	Lam Soon Estate only used pesticides that were officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A); and in accordance with USECHH Regulations 2000. From the review of the chemical register, it was noted that all pesticides used are of class III & class IV. The use of paraquat had been banned in Lam Soon estate since 2006. There was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions were used. Methamidophos was last used in 2017 for trunk injection to treat

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Clause	Indicators	Comply Yes/No	Findings
	circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks. The due diligence refers to:		bagworm attack. Since 2019, Lam Soon had replaced the usage of Methamidophos to cypermethrin a class III chemical. From records and interviews with workers, staff and estate assistants, found that they were trained, all precautions taken, and all legal requirements met. Signboards indicated 'AWAS Dilarang Masuk', block, dates of operation, type of operation and chemical were used.
	7.2.5a Judgment of the threat and verify why this is a major threat.	Yes	As mentioned above in 7.2.5. of this check list and based on audit findings, there was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat had been used. Hence, the need for a judgment of the threat assessment does not apply on the Lam Soon CU.
	7.2.5b Why there is no other alternative which can be used.		
	7.2.5c Which process was applied to verify why there is no other less hazardous alternative.		
	7.2.5d What is the process to limit the negative impacts of the application.		
	7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.		
	7.2.6 (C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.	Yes	The estate and mill have the SOP for handling of chemical/pesticides. The employees involved in the chemical handling such as the storekeepers, lab operators, sprayers, fertilizer and P&D workers were trained in chemical handling, and they understood the hazards of the chemicals and how the chemicals should be used in a safe manner. Appropriate safety and application equipment had been provided and used as per the CHRA. The trade and generic names of the chemicals were made known to them through the SDS training. It was also noted that SDS are available at chemical and fertilizers during the audit. From the interviews with the workers and staffs in the fields and stores clerk, it was demonstrated that they had been trained and were aware of safe handling procedures.
	7.2.7 (C) Storage of all pesticides is in accordance with recognised best practices.	Yes	During Site visit, the chemical stores in Lam Soon Estate (KK and KL Div) were found to be in compliance with the Occupational Safety and Health Act 1994 (Act 514) as well as in the Pesticides Act 1974 (Act 149), Sign board were following the guidelines Safety Data Sheet. Records of purchase, storage and use were maintained. All store buildings were equipped with exhaust fans with the door secured. Hazard signage followed as per SDS – thus previous NCR was satisfactory closed. Empty pesticides containers were triple rinsed, holes punched and stored separately in the scheduled wastes store. Thereafter disposal arrangement will follow accordingly as per procedures.
	7.2.8 All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes.	Yes	All pesticide containers are properly disposed of and/or handled as per Schedule waste management procedure, and waste management plan 2023. At LSP Estate the scheduled waste was stored not more than 180 days, recorded in the e-swiss system.

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Clause	Indicators	Comply Yes/No	Findings
	7.2.9 (C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.	Yes	There was no aerial spraying has been practiced in the LSP Estate. <i>Neproliphs biserata</i> was maintained and encouraged to be planted in LSP CU. This can be seen in their continuous improvement plan. This was to suppress growth of noxious weeds and thus reduce the use of pesticides for selective weeding. Woody sprayings were carried out whenever necessary and only twice a year. Blanket spraying was not practiced in order to encourage soft grasses in inter row and frond stacking area.
	7.2.10 (C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.	Yes	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is therefore demonstrated by Lam Soon CU. 50 workers involved in handlings pesticides had been examined under the medical surveillance programme. From the results, all workers fit to handle chemical.
	7.2.11 (C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.	Yes	During site visits there was no breastfeeding women and underage of 18 workers involved in chemical applications. All estates maintained the list of sprayers. Identification of pregnancy status is made by the respective appointed Medical Assistant during the monthly check-up. Field interviews with the lady workers confirmed that such a regulation is a standard practice in the estate and mill and in compliance.
7.3 Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.	7.3.1 A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.	Yes	Waste management and disposal plan to avoid or reduce pollution had been documented and in the "Waste management Plan for the Year 2023". In the sampled estate and mill, the waste management program and plan seen incorporated with environmental impact aspect assessments and pollution prevention plan. The assessment seen effectively covers on matured maintenance, FFB collection, workshop, schedule waste / chemical / fertilizer store and etc. Sampled the EFB collection from mill and the area/filed mulched. The PIC and time frame was also shown in the management plan.
	7.3.2 Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.	Yes	Proper disposal waste management is in place.
	7.3.3 The unit of certification does not use open fire for waste disposal.	Yes	There was no evidence of fire has been used for waste disposal.
7.4 Practices maintain soil fertility at, or where improve soil fertility to, a level that ensures optimal and sustained yield.	7.4.1 Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.	Yes	The Lam Soon CU continued to manage and improve soil fertility to a level that ensures optimal and sustained yield by monitoring the fertilizer inputs through annual fertilizer applications. The process of the fertilizer application commences from an agronomist visit for a leaf sampling to determine the level of nutrient therein. Thereafter the calculation will be made for an input of fertilizer to maintain/improve the nutrient at the desired level. Estates will use this input for the entire fertiliser requirement in the field identified.
	7.4.2 Periodic tissue and soil sampling is	Yes	Evidence of periodic tissue foliar and soil analysis to monitor the changes in nutrient status was available



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Clause	Indicators	Comply Yes/No	Findings		
	carried out to monitor and manage changes in soil fertility and plant health.		and presented in the report by <i>Applied Agriculture Resources Sdn Bhd</i> . The results of the analysis were used by the agronomist for their recommendation for fertilizers applications programs year 2023. The soil sampling nutrient status was shown in the report by <i>Param Agricultural Soil Surveys (M) Sdn Bhd</i> dated Feb 2017.		
	7.4.3 A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.	Yes	The Lam Soon CU Estate had a nutrient recycling strategy in place which included stacking pruned fronds in the respective fields to decompose, grass cutting harvesters paths and letting the cut mass to decompose in the field, EFB mulching and application of Solid POME. In addition, during replanting, palms were felled, chipped, windrowed and left to decomposed. EFB & POME application is done as part of nutrient recycling strategy and recorded regularly. All EFB & POME were sourced from Lam Soon POM.		
	7.4.4 Records of fertiliser inputs are maintained.	Yes	Fertilizer inputs were based on recommendation by the Applied Agricultural Resources Sdn.Bhd. (AAR). The application programs were monitored using program sheets, bin cards, field cost book and manuring program sheets.		
7.5 Practices minimise and control erosion and degradation of soils.	7.5.1 (C) Maps identifying marginal and fragile soils, including steep terrain, are available.	Yes	There were no fragile/marginal soils in Lam Soon CU. Soil survey and assessment report was conducted by Param Agriculture Soil Surveys (M) Sdn Bhd in February 2017. The purpose of this assessment was to characterize the soils in the estate with a view of grouping the soils into management group for oil palm cultivation and to highlight problem if any. The report concluded that the soils series as follows:		
			No	Estate	Soil series
			1	KK	Dagat, Stom, Gol, Kumansi, Talisai, Kekura, Tok Yong, Lundang, Medang, Lating, Tepus
			2	KL	Jempol, Stom, Gol, Kumansi, Kuah, Kekura, Tok Yong, Lundang, Buran, Lating
	7.5.2 No replanting on steep slopes (above 25 degress) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25°) larger than 25 Ha within the Unit of Certification.	Yes	Lam Soon CU had a management strategy for planting on slopes to minimize and control erosion and degradation of soils. The plantings on slopes between 9 and 25 degrees was guided by: a) Lam Soon Management Services Sdn Bhd-oil palm agricultural policy. b) It was observed that no replanting of any individual, contiguous area of steep terrain (greater than 25°) larger than 25 Ha within the CU. c) It was also observed that practices to minimize and control erosion and degradation of soils were in place through proper stacking of fronds, EFB application, avoidance of blanket spraying, construction terraces, road maintenance and maintenance of soft vegetation in interlines. d) Cover crop were planted in the replants and in some mature areas. The cover crop <i>Mucuna bracteata</i> had been planted along most slopes by the management. Large areas with <i>Nephrolepis biserrata</i> in the inter rows were sighted during the visit.		
	7.5.3 There is no new planting of oil palm on steep terrain.	Yes	Lam Soon CU had a management strategy for planting on slopes to minimise and control erosion and degradation of soils. It was observed that there is no new planting of oil palm on steep terrain.		

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Clause	Indicators	Comply Yes/No	Findings
7.6 Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.	7.6.1 (C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations.	Yes	There were no marginal and fragile soils, this was evidence during site visits and report from soil survey <i>Param Agricultural Soil Surveys (M) Sdn Bhd</i> . Only 2% from the total area was a steep terrain.
	7.6.2 Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.	Yes	Based on document review and site visits, there is no new extensive planting on marginal and fragile soils in Lam Soon CU.
	7.6.3 Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	Yes	Soil survey and assessment report was conducted by Param Agriculture Soil Surveys (M) Sdn Bhd. Topographic maps also were established during the soil survey assessment. The topographic information was provided and reviewed by the auditors.
7.7 No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.	7.7.1 (C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.	Yes	It has been confirmed that Lam Soon CU did not have peat land. It is consistent with the new soils map provided by Param Agriculture Soil Surveys (M) Sdn Bhd. Hence, this requirement is not applicable.
	7.7.2 Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peat land Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).	Yes	It has been confirmed that Lam Soon CU did not have peat land. It is consistent with the new soils map provided by Param Agriculture Soil Surveys (M) Sdn Bhd. Hence, this requirement is not applicable.
	7.7.3 (C) Subsidence of peat is monitored, documented and minimised.	Yes	It has been confirmed that Lam Soon CU did not have peat land. It is consistent with the new soils map provided by Param Agriculture Soil Surveys (M) Sdn Bhd. Hence, this requirement is not applicable.
	7.7.4 (C) A documented water and ground cover management programme is in place.	Yes	It has been confirmed that Lam Soon CU did not have peat land. It is consistent with the new soils map provided by Param Agriculture Soil Surveys (M) Sdn Bhd. Hence, this requirement is not applicable.
	7.7.5 (C) For plantations planted on peat, drainability assessments are conducted	Yes	It has been confirmed that Lam Soon CU did not have peat land. It is consistent with the new soils map provided by Param Agriculture Soil Surveys (M) Sdn Bhd. Hence, this requirement is not applicable.

## RSPO PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
	<p>following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>This is subject to transitional (5 years: 2019 to 2025) arrangement stated in the Drainability Assessment Procedure. Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p>		
	7.7.6 (C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2018) and associated audit guidance.	Yes	It has been confirmed that Lam Soon CU did not have peat land. It is consistent with the new soils map provided by Param Agriculture Soil Surveys (M) Sdn Bhd. Hence, this requirement is not applicable.
	7.7.7 (C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm	Yes	It has been confirmed that Lam Soon CU did not have peat land. It is consistent with the new soils map provided by Param Agriculture Soil Surveys (M) Sdn Bhd. Hence, this requirement is not applicable.

## RSPO PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings																	
	Cultivation on Peat', version 2 (2018) and associated audit guidance.																			
7.8 Practices maintain the quality and availability of surface and groundwater.	7.8.1 A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:	Yes	The CU Water Management Plans for 2023 were sighted. Among plan been initiated were: a) The management plan was updated to include the collection of rainwater, line site water usage monitoring, contingency plan when dry spell or water shortage and action to be taken in case of water pollution, etc. Workers were advised to conserve water, briefing made during muster. b) Rainfall records based on rain gauge reading were available on site. Records of rainfall data, for the last 10 years, to assist in the water management plans were sighted. c) LSP POM Water Management plan was included the recycling of process water, recycle condensate water, reusing of treated water from POME for cleaning purpose at mill and hydro cyclone operation during water shortage, collection of rainwater, line site water usage monitoring and contingency plan to cover dry spell/shortage.																	
	7.8.1a The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.	Yes	Lam Soon certification soon does not restrict access to clean water or contribute to pollution of water used by communities. It was confirmed through interviews with nearby estate and stakeholder. LSP POM had conduct river water analysis (Sg Tenegang) thru accredited laboratory Dynakey Laboratories Sdn Bhd by monthly basis at 2 points (upstream and downstream) of unnamed river located in the CU. LS Estate also conduct river water analysis thru accredited laboratory KDC Laboratory at 2 points (upstream and downstream) of 2 river (sg. Kam Chong & Sg Sandau) located in the CU.																	
	7.8.1b Workers have adequate access to clean water.	Yes	At LSP CU drinking water has been supplied through water treatment plan area located at LSPOM. Treated water for domestic use are being sent to accredited lab, Permualab Sdn Bhd for water quality sampling as per the Company's Water Management Plan.																	
	7.8.2 (C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017).	Yes	Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones has been verified at the Lam Soon Estate. Riparian buffer zones have been identified and demarcated. No chemicals and fertilizer application observed been used in their maintenance. In some area's <i>vetiver</i> grass had been planted along the riverbanks. Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. The guidelines are detailed in the SOP Lam Soon. The buffer zones established are as following: <table><tr><td></td><td>River width</td><td>Buffer zone</td></tr><tr><td>1</td><td>➤ 40 meters</td><td>50 meters</td></tr><tr><td>2</td><td>20 - 40 meters</td><td>40 meters</td></tr><tr><td>3</td><td>10 - 20 meters</td><td>20 meters</td></tr><tr><td>4</td><td>5 - 10 meters</td><td>10 meters</td></tr><tr><td>5</td><td>&lt; 5 meters</td><td>5 meters</td></tr></table> During the field visit to all the estates it was observed that all the buffer zones and watercourses boundaries were maintained without noting any sign of spraying made in the identified areas. Sungai Kam Chong and Sungai Sandau riparian buffer zones.		River width	Buffer zone	1	➤ 40 meters	50 meters	2	20 - 40 meters	40 meters	3	10 - 20 meters	20 meters	4	5 - 10 meters	10 meters	5	< 5 meters
	River width	Buffer zone																		
1	➤ 40 meters	50 meters																		
2	20 - 40 meters	40 meters																		
3	10 - 20 meters	20 meters																		
4	5 - 10 meters	10 meters																		
5	< 5 meters	5 meters																		

## RSPO PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings								
	7.8.3 Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.	Yes	LSPOM had submitted quarterly return form to DOE for discharge quality of mill effluent and results were within permissible limit.								
	7.8.4 Mill water use per tonne of FFB is monitored and recorded.	Yes	Mill water use per tonne of FFB is monitored and recorded as per below: <table><tr><td>Year</td><td>2022</td></tr><tr><td>Water usage/tonne</td><td>1.24</td></tr></table> .	Year	2022	Water usage/tonne	1.24				
Year	2022										
Water usage/tonne	1.24										
7.9 Efficiency of fossil fuel use and the use of renewable energy is optimised.	7.9.1 A plan for efficiency of the use of fossil fuels and to optimise renewable energy is in place, monitored and documented.	Yes	LSPOM Fossil fuel Reduction Plan for Financial Year 2023 was established and monitored. Reduce Diesel usage – by monitoring and maintaining the maintenance of the boiler & machineries to ensure at optimum level, to monitor diesel usage, provide training to workers regarding reduce fuel and diesel usage for power generation. <table><tr><td>Year</td><td>2022</td></tr><tr><td>Diesel/tonnage</td><td>3.57</td></tr></table> LSE Fossil fuel Reduction Plan for Financial Year 2023 was established and monitored. Reduce Diesel usage – by monitoring and maintaining the maintenance of the vehicles to ensure at optimum level, to monitor diesel usage, provide training to workers regarding reduce fuel optimization of the vehicles. <table><tr><td>Year</td><td>2022</td></tr><tr><td>Diesel/tonnage</td><td>3.10</td></tr></table> .	Year	2022	Diesel/tonnage	3.57	Year	2022	Diesel/tonnage	3.10
Year	2022										
Diesel/tonnage	3.57										
Year	2022										
Diesel/tonnage	3.10										
7.10 Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise	7.10.1 (C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.	Yes	Sighted & received data GHG calculator calculated for year 2022 for LSP CU. GHG emission has been identified and assessed to the estate and mill through list of waste, EIA, pollution prevention plan, etc. for year 2022/2023. CU calculated the emission through RSPO Palm GHG calculator version 4 (data as table below). <b>Summary of Net GHG Emissions</b> <table><tr><th>Emissions per Product</th><th>tCO2e/tProduct</th></tr><tr><td>CPO</td><td>1.04</td></tr><tr><td>PK</td><td>1.04</td></tr></table>	Emissions per Product	tCO2e/tProduct	CPO	1.04	PK	1.04		
Emissions per Product	tCO2e/tProduct										
CPO	1.04										
PK	1.04										

## RSPO PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings			
GHG emissions.			Land Use		Unit	
			OP planted on Mineral Soil		5593 Ha	
			OP planted on peat		0	
			Total oil palm planted		5593 Ha	
			Conservation (forested)		0	
			Conservation (non-forested)		122 Ha	
			OER		22.87%	
			KER		4.13%	
			Summary of Field Emissions and Sinks			
			Own Crop			
				tCO2e	tCO2e/ha	tCO2e/tFFB
			Emissions			
			Land Conversion	52425.14	9.37	0.46
			*CO2 Emissions from Fertiliser	2809.57	0.50	0.02
			**N2O Emissions fertilizer	3877.89	0.69	0.03
			Fuel Consumption	1109.01	0.20	0.01
			Peat Oxidation	0.00	0.00	0.00
			Sinks			
			Crop Sequestration	-49692.10	-8.88	-0.43
			Conservation Sequestration	0	0	0
			Total	10529.51	1.88	0.09
			Mill Emissions and Credits			
				tCO2e	tCo2e/tFFB	
			Emissions			
			POME	22462.47	0.20	
			Fuel Consumption	1559.22	0.01	
			Grid Electricity Utilisation	0	0	
			Credits			
			Export of Grid Electricity	-1073.69	-0.01	
			Sales of PKS	-1364.00	-0.01	

## RSPO PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings														
			Sales of EFB	0	0												
			Total	21583.99	0.19												
	7.10.2 (C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (guided by the RSPO GHG Assessment Procedure for New Development).	Yes	Auditors has verified through checking the <a href="http://www.globalforestwatch.com">www.globalforestwatch.com</a> , Google Maps, Estate Maps and also through site visit to the sampled estates areas. Based on the observation during the audit, it is confirmed that there were no new planting or new development of areas at Lam Soon CU. Hence, RSPO GHG Assessment Procedure for New Development was not applicable.														
	7.10.3 (C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.	Yes	<p>The Environmental Impact and Aspect Assessment and Pollution Prevention Plan was used to identify the GHG emissions. Some of the Greenhouse Gas emissions are through Land Conversation, Crop Sequestration, Fertilizer, N<sub>2</sub>O from fertiliser, Fuel Consumption, Peat Oxidation. Plans to reduce or minimise them are in place.</p> <p>The significant pollutants in the mill &amp; estate has been identified in the pollution prevention Plan – FY 2023.</p> <table><tr><th>Environmental issue</th><th>Mitigation measures</th></tr><tr><td>To reduce dark smoke emission</td><td>-Quarterly stack sampling has been carried out by external bodies -Carry out routine maintenance Install CCTV link direct to DOE -installation wet scrubber</td></tr><tr><td>Wastewater discharge through land</td><td>-Regularly effluent ditches and its surrounding for leakage. -to conduct clean up all the trap regularly</td></tr><tr><td>Chemical and lubricant spillage</td><td>-to ensure used oil and rag in drums are properly stacked and well contained -to clean regularly all the sand and oil trap</td></tr><tr><td>Reduction of greenhouse gas emission</td><td>-installation wet scrubber to reduce emission from chimney</td></tr><tr><td>Fossil Fuel Reduction</td><td>-Reduce vehicle running hours for unnecessary work -To ensure field road in good condition to vehicle running smooth -Share vehicle for transporting workers with others</td></tr></table>			Environmental issue	Mitigation measures	To reduce dark smoke emission	-Quarterly stack sampling has been carried out by external bodies -Carry out routine maintenance Install CCTV link direct to DOE -installation wet scrubber	Wastewater discharge through land	-Regularly effluent ditches and its surrounding for leakage. -to conduct clean up all the trap regularly	Chemical and lubricant spillage	-to ensure used oil and rag in drums are properly stacked and well contained -to clean regularly all the sand and oil trap	Reduction of greenhouse gas emission	-installation wet scrubber to reduce emission from chimney	Fossil Fuel Reduction	-Reduce vehicle running hours for unnecessary work -To ensure field road in good condition to vehicle running smooth -Share vehicle for transporting workers with others
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Fossil Fuel Reduction	-Reduce vehicle running hours for unnecessary work -To ensure field road in good condition to vehicle running smooth -Share vehicle for transporting workers with others																

## RSPO PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
			<div>gang</div> <div>-To ensure no overloading of FFB evacuation.</div> <div>-To make sure vehicle in very good condition to avoid consume more diesel.</div>
7.11 Fire is not used for preparing land and is prevented in the managed area.	7.11.1 (C) Land for new planting or replanting is not prepared by burning.	Yes	There was no evidence that fire had been used to prepare land for replanting in all estates.
	7.11.2 The unit of certification establishes fire prevention and control measures for the areas under its direct management.	Yes	<p>Lam Soon CU had established the fire prevention and control measures for the areas under its direct management. Accident and emergency procedures were available in adherence to the policy on <i>Emergency Response' Plan 2023</i>.</p> <p>Each estate and mill had a standard procedure for emergencies situation. There was formation of ERP Team &amp; ERP for all the identified incidences. The organization chart for the ERP team was established and displayed for information to the employees. The important telephone contact numbers were also provided therein. Among the equipments available for fire prevention were water pump, water tank lorry, and fire extinguisher.</p>
	7.11.3 The unit of certification engages with adjacent stakeholders on fire prevention and control measures.	Yes	<p>Lam Soon CU had also established the fire prevention and control measures with adjacent stakeholders through letter communication correspondence which were distributed on 23/05/2023 to all neighboring stakeholders. The information among others includes</p> <ol style="list-style-type: none"> <li>Compliance to RSPO requirement including zero burning engagement.</li> <li>Basic understanding of RSPO the no open burning.</li> <li>Stated LSP CU will assist neighboring stakeholder if any burning occurs.</li> </ol>
7.12 Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or	7.12.1 (C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests. A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.	Yes	Auditors has verified through checking through <a href="http://www.globalforestwatch.com">www.globalforestwatch.com</a> , Google Maps, Estate Maps and also through site visit to all estates. Based on the audit findings, it was confirmed that no land clearing since 2005.
	7.12.2 (C) HCVs, HCS forests and other conservation areas are identified as follows:	Yes	A report entitled "High Conservation Value (HCV)/Biodiversity Assessment of the estates Lam Soon Plantations" was made available during the audit. The study was conducted by S.K Yap Forestry and Landscape Advisor Services and the report was completed in May 2017 and amended on January 2018. The study covered all the High Conservation Value (HCV)/Biodiversity within and adjacent to LSP CU. The outcome of the assessment found that there is non-availability of high conservation value within the
	7.12.2a For existing plantations with an HCV assessment conducted by an RSPO-		



## RSPO PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
enhanced.	approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.		boundaries of any of the sites of LSP CU. This was due to the location of Lam Soon Plantations CU which completely surrounded by other oil palm plantations. However, the management decided to maintain the Buffer Zone as their conservation Area i.e. 122 Ha. Further revision of HCV assessment titled "Assessment on HCV within Lam Soon Plantations Sdn Bhd" dated 10 April 2019, was prepared by Sustainability Department, Lam Soon Plantations Sdn Bhd, Lahad Datu Sabah. The report was reviewed by S.K. Yap Forestry and Landscape Advisor Services, Kuala Lumpur. The later HCV assessment covers KK Estate and KL Estate with an area of 5,682.6 ha within the Lam Soon Plantations Sdn. Bhd. to determine the presence of sites with high conservation attributes in line with the certification requirements of Roundtable Sustainable Palm Oil (RSPO) and Malaysian Standard, the HCV Assessment (Clause 5. - HCV Identification findings) had found that the Lam Soon Plantations Sdn Bhd had good representatives of biodiversity in both flora and fauna even with the clearing of the natural vegetation during the plantation establishment. The estate has water catchment area and small river, and their riparian buffer zone are place under HCV 4.2 for erosion control. The most common HCV features were the riparian buffer zone which was common in the two estates of KK and KL estate.
	7.12.2b: Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.		
	7.12.4 (C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).	Yes	The HCV Assessment (Clause 5. - HCV Identification findings) had found that Lam Soon Plantations Sdn Bhd had good representatives of biodiversity in both flora and fauna within the CU's and maintain the area as HCV Management Area. Common fauna found such as beaver, kingfisher birds, foxes etc. HCV Management Area Monitoring Plan has been established for year 2023 which is prepared by Nasius Nasip and Verified by Mosdi bin Latif in June 2023. Although there is no RTE species at LSP CU, the management decided to maintained conservation management area as follows: Point 1 – Pond Point 2 – Orchard Point 3 – KL2019C (Buffer Zone) – 122ha Point 4 – KK2018A (Unplanted area) – 2.76ha Point 5 – Office compound  The CU had a regular programme to educate its employees pertaining to the protection of the RTE as well as the protection of buffer zone. Training on HCV and RTE protection was provided to the workers on 21.11.2022. The CU has conducted a regular patrol of HCV areas, access and boundary of estates. Records of monitoring in KL Division were available. Observation made during site visit confirmed there is no sign of spraying activity at buffer zone. The yellow marking 'X' was intact. Signage such as "No Hunting", "No Fishing", "Buffer Zone" were also available. In general, the action plan has been implemented accordingly. Although there are no threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations, appropriate measures were maintained, and monitoring plan were continuously implemented accordingly.
	7.12.5 Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peatland	Yes	There are no rights of local communities identified in the HCV assessment conducted in 2017.

## RSPO PUBLIC SUMMARY

Clause	Indicators	Comply Yes/No	Findings
	and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.		
	7.12.6 All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.	Yes	All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. Training on High Conservation Value [HCV], Buffer Zone & RTE was conducted in Apr 2023 to regularly educate the workforce about the status of HCV and RTE protection. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species as these was explained during awareness training in May 2021, and posters are placed at rollcall area and main gate of CU. Lam Soon Plantations CU management will notify the relevant authorities immediately should they found any activities to capture, harm, collect or kill RTE species. The Estate also make a statement dated on 8.05.2017 for disciplinary action is to be taken against those who are found to capture, harm, collect or kill RTE species according to law "Enakmen Pemeliharaan Hidupan Liar 1997".
	7.12.7 The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.	Yes	A Management Plan named 'HCV Monitoring Plan' for year 2023 were available at LS Estate. LS Estate has conducted scheduled monthly monitoring of their Buffer zone and Boundary. Records of monitoring for both KK and KL Division were available for review. There is no RTE species found within the estates area. Outcomes of the monitoring was fed back into the 'HCV Monitoring Plan'.  It was noted the LSP CU had continued to implement planned actions such as awareness to the staffs and public on enhancing biodiversity, posting of relevant information in the Lam Soon webpage and erection of signage at strategically locations.
	7.12.8 (C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.	Yes	Auditors has verified through checking through <a href="http://www.globalforestwatch.com">www.globalforestwatch.com</a> , Google Maps, Estate Maps and also through site visit to all estates. Based on the audit findings, it was confirmed that there has been no land clearing at LSP CU since Nov 2005. Remediation and Compensation Procedure (RaCP) did not apply.

## RSPO PUBLIC SUMMARY

### RSPO Certifications Systems for P&C and RISS, Nov 2020

Clause	Indicators		Comply Yes/No	Findings
5.5.2 Time-bound plan  A time-bound plan for certifying all its management units and/or entities, including the units where the organization has mgmt. control and/or minor shareholding, is submitted to the CB during the initial certification audit. The time-bound plan shall contain a current list of all estates and mills.	(a)	As a minimum, all estates and mills shall be certified within 5 years after obtaining RSPO membership. Any new acquisitions shall be certified within a 3-year timeframe. Any deviations from these maximum periods requires approval by the RSPO Secretariat.		For the time-bound plan, Lam Soon Cannery Private Limited has already certified all their units Such as Lam Soon CU at Lahad Datu and Dara Lam Soon at Muadzam Pahang.
	(b)	Progress towards this plan shall be verified and reported on in subsequent annual surveillance audits by the CB. Where the CB conducting the surveillance audit is different from the CB which first accepted the time-bound plan, the later CB shall accept the appropriateness of the time-bound plan at the moment of first involvement and shall only check continued appropriateness;		Not applicable
	(c)	Any revision to the time-bound plan or to the circumstances of the company shall cause the time-bound plan to be reviewed by the CB. Changes to the time-bound plan are permitted only where the organization can demonstrate to the CB that they are justified. The requirements will also apply to any newly acquired subsidiary from the moment that the company is legally registered with the local notary or chamber of commerce (or equivalent);		Not applicable
	(d)	Where there are isolated lapses in implementation of a time-bound plan, a minor non- compliance shall		Not applicable

## RSPO PUBLIC SUMMARY

		be raised. Where there is evidence of fundamental failure to proceed with implementation of the plan, a major non-compliance shall be raised.		
5.5.3 Requirements for uncertified management units:	(a)	No replacement of primary forest or any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.12. Any new plantings since 1 <sup>st</sup> January 2010 shall comply with the RSPO New Planting Procedure (NPP). For each new planting development, compliance with the NPP shall be verified by an RSPO accredited CB;		Lam Soon Cannery Private Limited has already certified all their units Such as Lam Soon CU at Lahad Datu and Dara Lam Soon at Muadzam Pahang.
	(b)	Land conflicts, if any, are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8;		Not applicable
	(c)	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2;		Not applicable

## RSPO PUBLIC SUMMARY

	(d)	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1;		Not applicable
	(e)	The audit team shall assess compliance with these rules at each assessment of any of the applicable management units. Assessment of compliance with requirements 5.5.3 (a) – (d) above by the audit team based on self-declarations only by the company,		Not applicable
		with no other supporting documentation, shall not be acceptable. Verification of compliance shall be based on the following approach:		
		<ul style="list-style-type: none"> <li>A positive assurance statement is made, based upon self-assessment (i.e. internal audit) by organization. This would require evidence of the self-assessment against each requirement;</li> </ul>		
		<ul style="list-style-type: none"> <li>Targeted stakeholder consultation, including consultation with the relevant NGO's will be carried out by the audit team.</li> </ul>		Not applicable
		<ul style="list-style-type: none"> <li>Desktop study e.g. web check on relevant complaints</li> </ul>		Not applicable
		<ul style="list-style-type: none"> <li>If necessary, the audit team may decide on further stakeholder consultation or field inspection, assessing the risk of any non-compliance with the requirements.</li> </ul>		Not applicable
	(f)	For requirements 5.5.3 (a)-(d) above, the classification of critical and non-critical is as stated in the RSPO P&C.		Not applicable

## RSPO PUBLIC SUMMARY

		If a non-compliance against a critical indicator in a non-certified management unit is identified, the current certification assessment cannot proceed to a successful conclusion unless it is actively addressed. Evidence of active engagement with RSPO in resolving the non-compliance shall be available.		
	(g)	Failure to address any outstanding non-compliances within uncertified unit(s) as defined in 5.5.3 (f) above may lead to suspension of certificate of the certified unit(s), in accordance with the provisions of these Certification Systems.		Not applicable

## RSPO PUBLIC SUMMARY

<p>5.6.6</p> <p>The CB shall review whether oil palm operations have been established in areas which were previously owned by users and/or are subject to customary rights of local communities and indigenous peoples. If applicable, the CB shall consult directly with all of these parties to assess whether land transfers and/or land use agreements have been developed with their free, prior and informed consent and check compliance with the specific terms of such agreements.</p> <p>The CB shall have a mechanism in place to identify the interested parties and ensure a represented samples size of the interested parties are consulted in each audit.</p> <p>The CB shall keep track which party that has been interviewed in the previous audits to ensure proper coverage of the parties throughout the certification cycle.</p>		No additional indicators		<p>After the review of the document provided, it has been verified that the land titles were previously owned by Pacific Cocoa Plantations Sdn Bhd. The Pacific Cocoa bought land from the government of Sabah on 24 April 1986. The Company changed its name to Lam Soon Plantations Sdn Bhd in 8 July 2000. The Land title is Country Lease and also specified that the purpose of the planting is either for oil palm or agricultural crops for economic value. It can be confirmed that Lam Soon Plantations maintained and complied with the terms of the land title.</p>
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## RSPO PUBLIC SUMMARY

### ATTACHMENT 4

#### DETAILS OF NON-CONFORMITIES AND CORRECTIVE ACTIONS TAKEN

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Root Cause & Corrective Action Taken by the CU	Verification Statement by Auditors								
NEA 01-2023  6.2.3	Major	<p>Requirement: There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements. Finding: Insufficient evidence that overtime and rest day work were paid accordingly. Objective evidence:</p> <p><u>LSP POM</u> At the time of audit, 12 workers of both local and foreign were selected. It was noted that the review of workers' pay slip, punch card and check-roll logbook for the month of February 2023 revealed that overtime payment was varies with actual due to miscalculation. Details as follows:</p> <table><tr><td>Workers ID</td><td>Hours not paid</td></tr><tr><td>G0015</td><td>3</td></tr><tr><td>G0053</td><td>0.5</td></tr><tr><td>G0072</td><td>2.5</td></tr></table> <p><u>LSP Estate</u> Menuju Kejayaan was hired as FFB Transporter to evacuate FFB from field to the mill. Employment contract for each driver were available. However, verified through payslip, it was noted that the driver was not paid twice the ordinary rate per piece for working on rest day which is not in accordance with Sabah Labour Ordinance.</p>	Workers ID	Hours not paid	G0015	3	G0053	0.5	G0072	2.5	<p>Root cause:</p> <p>For LSP Mill, it was due to human error which were not detected during the checking of payment. For LSP Estate, it has been noted that the contractor still did not fully understand the mechanism of payment twice the ordinary rate per piece for working on rest day.</p> <p>Corrective Action:</p> <p><u>LSP Mill</u> The procedure for calculating the overtime has been established to improve the flow of the overtime calculation task and reduce the human error. Verification will be carried out every time a calculation on overtime being made. Upon verification only the mill will pay the overtime.</p> <p><u>LSP Estate</u> The management had conducted both training and briefing for relevant contractor dated 13/7/2023. Monthly monitoring form had been established as control measure to ensure all the relevant document is accordance to the legal requirement.</p>	<p>Identified root causes were accepted.</p> <p>The organization had established 'Cara pengiraan &amp; pembayaran gaji pekerja' dated 8/7/2023 and the flow are appropriate to manage and reduce human error. Verified briefing conducted attendant date 11/7/2023 on the latest procedure as awareness to employees.</p> <p>Sighted the issuance of warning letter to Kontraktor Menuju Kejayaan, as reminder on the issue. Meeting with contractor was evident i.e., conducted on 13/7/2023 as an action to prevent recurrence. Proof of payment was also sighted, and it can be concluded that the payment was done accordance to legal requirement.</p> <p>Closed.</p>
Workers ID	Hours not paid											
G0015	3											
G0053	0.5											
G0072	2.5											
RMN 01-2023  3.3.2	Minor	<p>Requirement: 3.3.2 A mechanism to check consistent implementation of procedures is in place. Finding: The procedures did not comprehensively cover the implementation for spraying activities Objective evidence:</p>	<p>Root cause:</p> <p>The risk assessment for heat stress was missed and not identified as hazard during work for sprayer.</p>	<p>Root cause accepted.</p> <p>Verification on HIRARC on heat stress classified Low dated 8/7/2023. Installation of safety signages related</p>								



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		No control for heat stress as hazard during the spraying activity provided in the safe spraying SOP LSPSB/LDU/SAFETY/SOP-05 dated April 2021.	<p>Corrective Action:</p> <p>Risk assessment conducted on 5/7/2023. The management thru OSH committee had decided to use administrative control since no case report (low), where to install signages at prominent area.</p>	<p>to heat stress adequate and will be verified in the next audit. Apart from this, refresher on types of hazards in HIRARC for all relevant activities at the estate has been scheduled.</p> <p>Status: Open</p>
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### ATTACHMENT 5

#### STATUS OF NON-CONFORMITIES PREVIOUSLY IDENTIFIED

P & C Indicator	Specification Major/Minor	Detail Non-conformances	Verification Statement by Auditors
4.2.2 MAR 01 2022	Minor	<p>Requirement: 4.2.2 Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p> <p>Finding: Procedures for complaints and grievances system was in place but not understood by the affected parties.</p> <p>Objective evidence: Based on interview with Piean's Enterprise representative, they were not understood of the complaints and grievances system, and how to channel their complaints and grievances to the management.</p>	<p>A flowchart titled 'Grievances Process' dated 30.11.2021 was available and verified. The said procedure was communicated through external stakeholder on 23.05.2023 and understood by affected parties. This was confirmed during interview with external stakeholders that the procedure in place is understood by them. Where necessary, anonymity of complainants and whistle-blowers are assured and will not be revealed to third parties as stated in the Lam Soon Human Right Policy. So far, there was no evidence of disputes at the audited sites. It can be concluded that the system that is open to all affected parties was in place and shall be able to resolve disputes, if any. Therefore, minor NCR MAR 01 2022 effectively closed.</p>
6.2.2 MAR 02 2022	Major	<p>Requirement: 6.2.2 (C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.</p> <p>Finding: Related documents detailing payments i.e payslip does not give accurate information on compensation for all work performed.</p> <p>Objective evidence: Based on documentation review, related documents detailing payments i.e payslip for contractor workers i.e Piean's Enterprise does not give accurate information on compensation for all work performed, i.e tonnage of the FFB has been cleared, working days on normal days and rest days, etc.</p>	<p>Sighted pay slips for 2 workers (driver) have a detail of payments such as:</p> <ul style="list-style-type: none"> <li>• Mengangkut BTS komisyen /tonne <ul style="list-style-type: none"> <li>-hari biasa,</li> <li>-hari rehat (2x)</li> <li>-cuti umum (3x)</li> </ul> </li> <li>• Lain-lain pekerjaan (jika diperlukan)</li> <li>• Pendapatan kasar</li> <li>• Pendapatan bersih</li> <li>• Caruman Perkeso</li> <li>• Kehadiran bekerja</li> </ul> <p>Status: closed</p>

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<p>6.7.2 RAR 01 2022</p>	<p>Minor</p>	<p>Requirement: 6.7.2 Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>Finding: emergency procedures was not available in national languages</p> <p>Objective evidence: Environment Emergency Response Plan (EERP), reference no: LSPOM/EERP/2021, date 28/09/2021, for effluent bund failure, land irrigation piping leaking / overflow, diesel skid tank failure, CPO tank failure, sludge/CPO spillage, EFB leachate overflow, SW liquid spillage/ overflow.- not available in national language</p>	<p>Environmental emergency response plan (EERP) for effluent bund failure,land irrigation piping leaking / overflow, diesel skid tank failure, CPO tank failure, sludge/CPO spillage, EFB leachate overflow, SW liquid spillage/ overflow. The organization had established dual language hence #Minor NCR RAR 01 2022 has been effectively closed.</p>
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## ATTACHMENT 6 – Timebound Plan

Name of the Unit of Certification (UoC)	Country	Name of the Mills and Supply Bases	Location Address	GPS Coordinates (in decimal degree)		Total Managed Area (Ha)	Certification Status (Certified / Not certified)	Actual Certification Year
				Latitude	Longitude			
Lam Soon Plantations Sdn Bhd	Malaysia	Lam Soon Palm Oil Mill	28 KM of Lahad Datu - Sandakan Highway, 91109 Lahad Datu, Sabah	5.254373	118.175882	N/A	Certified	25/8/2017
		Lam Soon Estate		5.244980	118.167033	5,885		
Dara Lam Soon Sdn Bhd		Dara Lam Soon Palm Oil Mill	KM 92 off Jalan Kuantan – Segamat 26700 Muadzam Shah, Pahang, Malaysia	3.157017	103.163633	N/A	Certified	18/5/2018
		Sungei Merba Estate		3.156767	103.161600	4,220		